

**U.S. EPA
CERCLA SECTION 104(e)**

INFORMATION REQUEST

Please note: This Information Request includes instructions for responding to this request and definitions of words such as "Respondent," "Property," "Material," "Identify," and "Investigation Area" used in the questions. Please provide responses to all the questions in this Information Request for each Property identified in response to Question 4 of Section 2.0, when appropriate. You must answer the Questions in this Information Request related to properties or facilities outside the Investigation Area if Question 4, Section 2.0 specifically instructs you to do so. For each response clearly identify the Property or Properties to which the response applies.

INFORMATION REQUEST QUESTIONS

Section 1.0 Respondent Information

1. Provide the full legal, registered name and mailing address of Respondent.

Response: The respondent is Cenveo Corporation ("Cenveo"). Cenveo's mailing address is One Canterbury Green, 201 Broad Street, Stamford, CT 06901. Cenveo was previously known as Mail-Well Corporation and as Mail-Well I Corporation (together referred to hereinafter as "Mail-Well"). Cenveo is a Delaware corporation first formed in 1994 as Mail-Well Corporation. Please also see Cenveo's Responses 4 and 5 for more historical information on Graphic Arts Center (hereinafter "GAC") and Cenveo.

2. For each person answering these questions on behalf of Respondent, provide:

- a. full name;
- b. title;
- c. business address; and
- d. business telephone number, electronic mail address, and FAX machine number.

Response: The following persons have provided information contained in Cenveo's response:

- 1. Missy Otis (supervisor for quality, safety and environmental matters at the 2000 NW Wilson Street facility)
- 2. Judy Dove (clerical assistant in shipping, maintenance, environmental, bindery purchasing and accounting at the

- 2000 NW Wilson Street facility)
3. Ron Tranellis (traffic and shipping supervisor)
 4. Steve Williamson (General Manager of Cenveo's St. Louis, MO operations)
 5. Scott Benjamin (General Manager, GAC/Flexoprep)
 6. Dave Marshall (Regional Controller)
 7. Dave Webber (General Manager of the 2000 NW Wilson Street facility)
 8. Lisa Gallagher (GAC Accounting Dept.)
 9. Kara Quarles (HR Manager, GAC)
 10. Chuck Wilson (former maintenance head)

Each of the individuals identified above is a current or former employee of Cenveo, GAC or GAC/Flexoprep, and is or has been associated with Cenveo, Graphic Arts Center, Inc. or GAC/Flexoprep (GAC/Flexoprep is a part of the GAC business that moved into the basement of the GAC building in September 2005). For privacy concerns, Cenveo is not providing specific contact information, but will do so at the request of EPA in the future. However, each person can be reached through Cenveo by contacting Ms. Marcia Berry, Assistant General Counsel at Cenveo, at 203.595.3064 or Marcia.Berry@cenveo.com.

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.

Response: The following person should receive all future correspondence concerning this Site:

Steve N. Siegel, Esq.
Murdock Goldenberg Schneider & Groh, LPA
35 East Seventh Street
Suite 600
Cincinnati, OH 45202
Phone: 513.345.3080
Fax: 513.345.8294
e-mail: ssiegel@mgs glaw.com

Section 2.0 Owner/Operator Information

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 –

{00018755; 1}

Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: Cenveo has identified eleven (11) separate facilities (mostly warehouses or parking lots) in the Investigation Area to which Cenveo or a predecessor has or has had some nexus during the period of investigation. They are as follows: (1) 2000 NW Wilson Street, Portland: this is the current Graphic Arts facility; (2) 2187 NW Reed Street, Portland (former Flexoprep and GAC/Flexoprep facility): this is about three (3) blocks north of the Graphic Arts facility; (3) South Parking Lot/across NW Wilson Street from 2116 NW 20th Avenue, Portland: this is the current parking lot which is diagonal to the NW Wilson Street property to the southeast; (4) North Parking Lot: this is the current parking lot which is diagonal to the NW Wilson Street property to the northeast; (5) 2116 NW 20th Avenue, Portland: this is the Iron Mountain building which is across NW 20th Avenue from the southern portion of the 2000 NW Wilson Street facility. This facility was a warehouse facility; (6) 2116 NW 20th Avenue Annex (Triangle Property, aka Glacier Park): this is just to the north of the Iron Mountain building, across NW 20th Avenue from the northern portion of the 2000 NW Wilson Street facility; (7) Swan Island: this is no longer an island, but it is the industrial area now attached to the east side of the river a little north of where the GAC and GAC/Flexoprep facilities are/were located. Allegedly just a warehouse; (8) Front Avenue: Front Avenue runs right beside the river on the west bank. A facility on Front Avenue might be right on the river, and there is some information that this is the case here. This was allegedly a warehouse location; (9) NW 19th Avenue and NW Thurman Street: This was allegedly a warehouse location; (10) Creative Mailing Services (on Swan Island); and (11) Small gravel Parking Lot area west across NW 21st Avenue from the main GAC facility located at 2000 NW Wilson Street, Portland.

Cenveo has completed separate responses for Sections 2.0 through 8.0, Requests 4 through 78, for each of the above facilities for ease of EPA's review, as well as a summary for the facilities as part of Response 5 contained herein. Hard copies of each Response as well as electronic copies of each Response and electronic copies of all exhibits are being provided to EPA. The exhibits apply to *all* of the responses, so a reference to Exhibit 5 in this document will be referring to the same exhibit as a reference to Exhibit 5 in the response for the NW Reed Street facility.

The information which follows in this document, except for the summary in Response 5, concerns the property Cenveo now owns and operates at 2000 NW Wilson Street, Portland, Oregon. This property houses the GAC business as well as the portion of the business known as GAC/Flexoprep. Both are a part of Cenveo Corporation.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

{00018755; 1}

Response: 1. 2000 NW Wilson Street, Portland: this is the current Graphic Arts facility.

One of Cenveo's Graphic Arts Center facilities ("GAC") operates at this address, as does a portion of the business known as GAC/Flexoprep. Both are a part of divisions of Cenveo Corporation. The parcels that make up this property were purchased at different times. Graphics Arts Center, Inc. (formerly known as GAC Acquisition Corp.) operated on one or more parcels that now make up this property since inception of the entity in approximately 1967. According to a 1989 Dames & Moore's Assessment Report, the main parcel on which GAC had operated since approximately 1967 was transferred from Schnitzer Investment Corp. to Yeon Investment on March 15, 1979, although it appears that Yeon leased the property to Agency Lithograph Company on November 30, 1965 (Agency Lithograph was one of several companies that combined to form GAC in the 1965-1967 time frame). Dames & Moore identified a February 1, 1980 lease between the State of Oregon – Economic Development Commission and GAC, although Cenveo is not certain that such a lease was actually in existence. GAC then purchased the property from Yeon on October 11, 1979.

In January 1980, GAC purchased a parcel on which Zehrung Corporation operated a production and formulation company. An entity called KHZ Corporation operated on this parcel prior to Zehrung. Cenveo is not certain of the relationship, if any, between Zehrung, owned by Mr. Hank Toby, and KHZ Corporation. For several years GAC leased the property back to Zehrung prior to constructing the GAC addition on the former Zehrung properties in the 1982-1985 timeframe.

GAC also purchased a small parcel from the Goldbergs on December 29, 1982. This property had also been controlled by Schnitzer (Schnitzer Steel Products Co.). Mail-Well, actually one of its operating entities, purchased the entire property in 1995 at the time the company purchased Graphic Arts Center, Inc. GAC was purchased by Mail-Well Commercial Printing, Inc. in August 1995, and was merged into Mail-Well Commercial Printing, Inc. on January 1, 2000. Later, Mail-Well Commercial Printing, Inc.'s name was changed to Cenveo Commercial, Inc., and Cenveo Commercial, Inc. was merged into Cenveo Corporation on January 25, 2005. Because of the merger into Mail-Well Commercial Printing, Inc. in 2000, the legal entity known as Graphic Arts Center, Inc. ceased to exist.

In 2003, the real property was sold to Mail-Well Canada Leasing Company and leased back to Mail-Well Commercial Printing, Inc. In 2006 the property was transferred to Cenveo Corporation.

2. 2187 NW Reed Street, Portland (former Flexoprep and GAC/Flexoprep facility): this is about three (3) blocks north of the Graphic Arts facility.

GAC/Flexoprep operated at 2187 NW Reed in Portland from 1998 until approximately September 2005. In 1994, Rono Graphic Communications ("Rono") purchased an entity known as Trade Litho Company, which owned the rights to the trade name "Flexoprep." Trade Litho had been operating at the 2187 NW Reed Street address prior to the time Rono purchased Trade Litho. In 1996, Trade Litho and a related entity, Hicks-Chatten, merged their operations at the

2187 NW Reed Street address. In 1998, Mail-Well purchased assets from Rono which allowed Mail-Well to use the Flexoprep trade name and to operate GAC/Flexoprep at the 2187 NW Reed Street address. This was the first point in time that GAC had any nexus to 2187 NW Reed Street. At all subsequent times, until the building was vacated in September 1995, Mail-Well's (later Cenveo's) interest in the 2187 NW Reed facility was a leasehold interest. Upon information and belief, the landlord was Clyde Thornburg, president of Trade Litho, Inc., although it appears the property owner was CET Interprises, Inc., 521 Desert Holly Drive, Palm Desert, CA 92211.

3. South Parking Lot/across NW Wilson Street from 2116 NW 20th Avenue, Portland: this is the current parking lot which is diagonal to the NW Wilson Street property to the southeast.

This parking area is situated diagonally to the southeast from the main GAC facility that is located at 2000 NW Wilson Street in Portland. GAC purchased this property from Johnson Acoustical & Supply Co. in September 1987. Thereafter it was sold to and leased back from Pflueger. Later the property was transferred back to GAC, and is still owned by GAC.

4. North Parking Lot: this is the current parking lot which is diagonal to the NW Wilson Street property to the northeast.

This small parking area is located diagonally across NW York Street/NW 20th Avenue intersection from the northeastern corner of the main GAC facility located at 2000 NW Wilson Street. It is believed that the North Parking Lot was part of the Annex property originally owned by Burlington Northern or its real estate subsidiary, Glacier Park. During the late 1990s, the North Parking Lot was split off from the southern portion of the Annex property. It appears that GAC may have first held a leasehold interest in this property, but that leasehold interest became a fee simple interest in the late 1990s.

5. 2116 NW 20th Avenue, Portland: this is the Iron Mountain building which is across NW 20th Avenue from the southern portion of the 2000 NW Wilson Street facility. This facility was a warehouse facility.

The 2116 NW 20th Avenue facility was the last of several warehouses used by the GAC operation prior to the time GAC was able to consolidate its operations into its main facility that it still operates at 2000 NW Wilson Street. The 2116 NW 20th Avenue is commonly known to GAC personnel as the "Lumber Products" property or the "Iron Mountain" property. The Iron Mountain property is directly across NW 20th Avenue from the southern portion of GAC's main facility at 2000 NW Wilson Street in Portland. The property was acquired by GAC from Lumber Products in 1989 and then sold to and leased back from Pflueger Properties. Lumber Products subleased the property from GAC until Lumber Products' new facility was available for occupation. It appears that GAC first occupied the property in 1991. GAC vacated the property in 1999, and the property was sold to Iron Mountain.

6. 2116 NW 20th Avenue Annex (Triangle Property, aka Glacier Park): this is just to the north of the Iron Mountain building, across NW 20th Avenue from the northern portion of the 2000 NW Wilson Street facility.

This property is the Annex to 2116 NW 20th Avenue, Portland Oregon. GAC leased the property from Pennbrook/Pflueger beginning in 1989 as a sublessee, although it is not clear from whom Pennbrook/Pflueger leased the property. Upon information and belief Burlington Northern Railroad owned the Annex. The Annex is sometimes referred to in documents as the Glacier Park property, the triangle property or the triangle building, and is adjacent to the north of the 2116 NW 20th Avenue property (The Glacier Park Company was a real estate subsidiary of Burlington Northern Railroad). There is a Burlington Northern Railroad ("BNR") spur on the property, and the property itself was owned by BNR. The property was leased to GAC in the same lease that conveyed the lease interest from Pflueger to GAC in 1989 for the Lumber Products facility, and GAC continued to use the Annex until 2002. Both the lot and the wood frame building are triangular in shape, with the building having approximately 5,000 square feet of floor space.

7. Swan Island: this is no longer an island, but it is the industrial area now attached to the east side of the river a little north of where the GAC and GAC/Flexoprep facilities are/were located. Allegedly just a warehouse.

This warehouse property was located at 5150 North Basin Avenue, which is on what is known as Swan Island in Portland. This area used to be an actual island, but at some time in the past the waterway between the island and the mainland was filled in, so now there is no actual island left. The property is approximately three blocks from the Willamette River. GAC leased the Swan Island Property in the mid-1980s. It was used until the time GAC was able to move into the Iron Mountain warehouse facility directly across NW 20th Avenue from GAC's main facility at 2000 NW Wilson Street in 1991. One current Cenveo/GAC employee recalled that the owner of the property was a person named Fred Meyer.

8. Front Avenue: Front Avenue runs right beside the river on the west bank. A facility on Front Avenue might be right on the river, and there is some information that this is the case here. This was allegedly a warehouse location.

This property was located at 1466 NW Naito Parkway, Portland. The address is just south of the point Front Avenue changes to Naito Parkway. It was a warehouse property utilized in the early 1980s for a staging area for outgoing mail to the post office. Based on information supplied by current Cenveo employees, the facility was used for a short time period, probably less than two years. The property was between the railroad and the river, but did not have any dock to the river, at least for the portion of the building that GAC used. The building had two truck loading docks. Crescent Electric used the other half of the building. Crescent Electric was a supply company. Upon information and belief, Mount Hood Chemical was the facility owner. While Cenveo has not located any documentation, current employees have indicated that the facility was leased by GAC from Mount Hood Chemical.

9. NW 19th Avenue and NW Thurman Street: This was allegedly a warehouse location.

This property address is 1825 NW Thurman Street (referred to herein as the "Thurman" Property"). It was being used as early as 1979. There may have been some relationship between the City of Portland and the Thurman Property as the City parked vehicles next door, and one current employee thought that GAC actually leased the Thurman Property from the City of Portland.

10. Creative Mailing Services (on Swan Island).

The Creative Mailing Services ("CMS") facility was next door to the Swan Island Property, and apparently operated at the same time as did the Swan Island Property. CMS was also used for storage, separating and mailing. GAC leased CMS in the mid-1980s. Like the Swan Island Property beside it, CMS was used until the time GAC was able to move into the Iron Mountain warehouse facility directly across NW 20th Avenue from GAC's main facility at 2000 NW Wilson Street in 1991. Cenveo/GAC personnel are not certain as to the legal relationship to the property. Apparently GAC either leased or bought the CMS property from a person named Fred Haase, who was an employee of GAC in the same time frame. Since GAC typically leased its warehouse facilities, and since Cenveo can find no evidence that GAC ever had a fee simple interest in the CMS facility, it is probable that GAC leased the CMS facility. Cenveo does not know what happened to the CMS facility after GAC moved out in 1991.

11. Small gravel Parking Lot area west across NW 21st Avenue from the main GAC facility located at 2000 NW Wilson Street, Portland.

The address for this parking area may have been 2135 NW 21st Avenue. There is some confusion about the address because some historical documents refer to 2116 NW Wilson Street, which, according to GAC personnel, has never had anything to do with the GAC operation. Street numbers between 2000 and 2200 apply to both north-south and east-west streets and avenues in this area, probably leading to this confusion. Cenveo knows very little about this parking area, other than knowing that some GAC personnel parked there during the 1980s and 1990s.

The property addressed in this primary response is located at 2000 NW Wilson Street, Portland, OR. GAC operates at this address, as does GAC/Flexoprep. The parcels that make up this property were purchased at different times. The Multnomah County Alternative Tax Lot ID numbers are R269721 and R269730 (the -730 number is for a small parcel that is part of the main property). At one time, the addition that was build onto the main GAC facility in the 1982-1985 time frame had a tax number of R-76600-0420, the main portion of the GAC facility had tax number R-76600-0300, and a small parcel had the tax number R-76600-1060. One of the other parcels that makes up the main facility previously had the tax

number R-76600-1140, but with the building addition -0420, was combined with the R269721 number in the 1995-1996 time frame. See Exhibit 1 for legal description.

For a legal description for the Zehrung property, please see Exhibit 2.

For a legal description of the property purchased from the Goldbergs, please see Exhibit 3.

GAC can best be described as a high-end commercial printing operation specializing in such things as annual reports and other high-impact publications. GAC/Flexoprep historically supplied film and film developing services to the printing industry.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- a. partners or joint venturers;
 - b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - c. any person subleasing land, equipment or space on the Property;
 - d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - e. major financiers and lenders;
 - f. any person who exercised actual control over any activities or operations on the Property;
 - g. any person who held significant authority to control any activities or operations on the Property;
 - h. any person who had a significant presence or who conducted significant activities at the Property; and
 - i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Except as set forth below as it applies to Zehrung, Weyerhaeuser, Ink Systems, O'Giesey and INX, Inc., Cenveo has no knowledge regarding who had control over any parcel of the Property, other than the previous owners, prior to the time GAC purchased each parcel that now makes up the Property. After the time GAC purchased the parcels that now make up the Property, only GAC, and later Cenveo, has had the right to control operations at the Property. Cenveo has no knowledge that any employee of GAC or Cenveo has ever had the right to control any of the operations at the Property except as allowed by GAC or Cenveo.

As previously mentioned, GAC purchased one of the parcels from

Zehrung in 1980. Zehrung operated a paint and insecticide blending company on this parcel from the 1950s until approximately 1982. After GAC purchased the property from Zehrung in 1980, GAC leased the property back to Zehrung until 1982 when Zehrung vacated the property, and GAC made plans to raze the Zehrung building and build an addition onto GAC's existing structure. It was at this time GAC discovered contamination that had been caused by Zehrung's operations. See Exhibit 4 which describes Zehrung's operations prior to the time GAC purchased the Zehrung property in 1980, as well as reference in the exhibit to KHZ Corporation, allegedly a predecessor of Zehrung's on the property.

Beginning as early as 1967, Paul O'Giesey, one of the owners of one of the entities that originally formed GAC, operated a scoring and cutting operation in the basement of the GAC facility. This lasted until approximately 1985. O'Giesey had the right to operate and control the portion of the facility in that area.

For some period of time in the 1980s and/or the early 1990s, a company that supplied ink to GAC maintained an in-plant operation at the GAC facility. Ink Systems, Inc. utilized a portion of the GAC facility on the first floor next to the flammable solvent storage room. Cenveo personnel do not believe this occupancy was ever formalized, although it is probable that Ink Systems controlled this portion of the GAC facility during the time the company operated there.

Beginning in 2003, INX, Inc. began ink mixing operations for GAC in the same area of the main GAC building where Ink Systems had operated. INX had the right to control this small portion of the facility pursuant to the agreement with GAC.

In the 1994 time frame, GAC entered into an agreement with Weyerhaeuser, whereby Weyerhaeuser operates a waste paper capture and recycling system at the main GAC facility. Weyerhaeuser has the right to operate in the collection/recycling area.

The legal descriptions provided as exhibits with Cenveo's response to Request No. 5 include descriptions of some easements on specific parcels.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Please see Cenveo's Response to Request No. 5. To the best of Cenveo's knowledge, GAC's interest after it purchased the separate parcels has been

in fee simple. Prior to the purchase from Yeon, GAC evidently had a leasehold interest in that parcel, although Cenveo has not identified a document reflecting this lease. Cenveo is not aware of any other interest GAC had in the other two parcels prior to the time the two parcels were purchased.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: To the best of its knowledge, only the parcel purchased from Zehrunge is certain to have had contamination on it when it was first purchased. The contamination on the property had been placed there by Zehrunge during its years operating on that parcel. Prior to the time GAC built an addition on that property, GAC conducted an extensive cleanup. Exhibits 1, 5 and 6 describe the cleanup, and associated documents provided therewith trace the State of Oregon's oversight and agreement that the parcel was cleaned up to the standards as set forth by Oregon prior to GAC building on the property. Confirmation sampling was performed after the removal was complete.

In 1989, four USTs were removed from the GAC property, followed by installation of two new USTs. Some soil contamination was discovered as a result of one or more leaking USTs. It is unknown when these USTs began leaking. See Exhibit 7 for information relating to the UST removal, including confirmation sampling results and confirmation from DEQ that it required no further action.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: See Cenveo's Response No. 8 contained herein. Prior to the time Cenveo purchased GAC in 1995, Dames and Moore, on behalf of McCown, De Leeuw & Co. (1989; see Exhibit 1), and Pilko & Associates, Inc. (1995; see Exhibit 27) performed Phase I ESAs on the property. The reports both concluded that the primary contaminant of concern, pentachlorophenol, had been remediated to levels below Oregon's industrial clean-up standard, and that no further action was needed at the property. It is not clear whether GAC knew or had reason to know prior to the time it purchased the Zehrunge property in 1980 that the property might be contaminated. But in any event, GAC cleaned up the property in the 1982-1984 timeframe.

GAC also conducted a soil foundation study prior to beginning construction of the addition to the GAC building. Please see Exhibit 8 attached hereto.

GAC cleaned up the contaminated soil where the USTs discussed in Response 8 were removed. It is doubtful that Cenveo would have known that the USTs had released any contents when it purchased the property in 1980, if the releases had already taken place.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of ownership;
 - b. all evidence showing that they controlled access to the Property; and
 - c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Cenveo has no other information regarding previous owners, access or releases/threatened releases except for that disclosed in Responses No. 5 and No. 8 above for the time GAC owned the properties. However, see Cenveo's Response to Request 22 and Exhibit 23 which describes a prior release.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of operation;
 - b. the nature of prior operations at the Property;
 - c. all evidence that they controlled access to the Property; and
 - d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Cenveo has no other information regarding previous owners, access or releases/threatened releases except for that disclosed in Responses No. 5 and No. 8.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: None of the properties with which Cenveo and/or its predecessor have or have had a nexus is/was an aquatic land.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:

- a. property boundaries, including a written legal description;
- b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c. location of all underground pipelines whether or not owned, controlled or operated by you;
- d. surface structures (e.g., buildings, tanks, pipelines, etc.);
- e. over-water structures (e.g., piers, docks, cranes, etc.);
- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response:

- a. Please refer to Exhibits 1, 2 and 3 for legal descriptions of the properties at the time each was purchased by GAC.
- b. Please refer to Exhibit 9 for approximate locations of utilities and/or sewers.
- c. Please refer to Exhibits 9, 10 and 11 which show sewers in the area. Other than these sewers, Cenveo is not aware of any underground pipelines at this facility.
- d. Upon information and belief, the original building was built sometime in the 1965-1967 time period. An addition was built in the 1982-1984 time period. Cenveo has been told that a smaller addition was

built onto the building in 1980, but has not identified any documentation of that addition.

e. Not Applicable.

f. Not Applicable.

g. The GAC facility has used catalytic converters or similar to control air emissions from the facility, and has used control devices to remove silver from process water and to adjust the pH of process water prior to discharge to the sanitary sewer.

h. None.

i. Upon information and belief, the facility has always been serviced by Portland sanitary sewer system. Please see Exhibits 9, 10 and 11 for the stormwater drainage system.

j. Four USTs were removed at the facility during the week of May 15, 1989, and were replaced with two new USTs that are still being used today. Some petroleum distillate solvent contaminated soil was found when the four tanks were removed. GAC remediated the soil and the State of Oregon issued a no further action letter for the UST-related contamination. The two new USTs at the GAC facility have held 2,000 gallons of SF Blanket Wash tank and 1,500 gallons of Web Blanket Wash tank. Today the 2,000 gallon tank holds AutoWash 9000, while the smaller UST is empty. The two USTs at the facility are in the southwest corner of the property near the intersection of NW Wilson Street and NW 21st Avenue. See the Site Plan included in the 1989 Dames & Moore Assessment Report attached hereto as Exhibit 1. The two new USTs were installed in approximately the same location as the four USTs that were removed in 1989.

As part of the demolition of the buildings at the former Zehrung facility, Roberts Environmental requested approval by DEQ to remove five USTs from the former Zehrung property. This request was made in December 1982. It is unknown what, if any, contamination was associated with these USTs.

k. Upon information and belief, the only major demolition and subsequent addition occurred in the 1982 to 1985 time frame when the former Zehrung facility was demolished, and GAC performed an extensive clean-up of the property that had been contaminated by Zehrung and/or KHZ Corporation. GAC also added on to the facility in the 1994-1995 time frame when it build an addition to house a larger paper recycling operation.

l. Please see Exhibits 12. These are drawings of the proposed new building that was constructed in the 1982 to 1985 time frame. Other maps/drawings are included in the Phase I Reports attached hereto as

Exhibit 1.

m. Please see Exhibit 13 for an aerial picture of the site.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: This property is not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Please see the Phase I Report as mentioned in Response 13(l) and the picture referred to in Response 13(m). Also see the confirmation sampling results taken after remedial activities ended on the portion of the property purchased from Zehrung and the sampling results taken after four USTs were removed at the facility in 1989. See Exhibit 5 for confirmation sampling results from the Zehrung remedial activities and Exhibit 7 for confirmation sampling results from the 1989 UST removal.

Prior to construction in the mid-1960s, a suitability study was performed on the soil where GAC's main facility was to be built. See Exhibit 14 attached hereto. Also see Exhibit 8 for the 1982 soil suitability study.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
 - dated aerial photograph of the site showing each unit/area;
 - the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
 - the dates that the unit/area was in use;
 - the purpose and past usage (e.g., storage, spill containment, etc.);
 - the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and

- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Other than the information included in Response No. 8, there are and were no waste management units or areas where materials are or were treated or disposed of on the parcels that make up the property. The disposal of materials described in Response No. 8 occurred prior to the time GAC purchased the property, and other than the information that appears in the report, Cenveo is without knowledge to respond to this Request No. 16.

GAC has stored waste for disposal in its 90-day storage area pursuant to RCRA regulations. The current 90-day storage area is in the southwest portion of the building, and to the best of Cenveo's knowledge, has always been in that same area. A portion of the waste from the GAC facility was for a time stored in the building at the property commonly known as the "Annex," the small piece of property and building that is immediately to the north of the Iron Mountain facility at 2116 NW 20th Avenue. This parcel was also known as the "Glacier Property" and the triangle property. The 90-day area at the Annex was near the center of the building.

As with any 90-day storage area, the volume of material in those areas at any one time varies widely, so no accurate estimate can be provided. The areas were, to the best of Cenveo's knowledge, always constructed of concrete floors, but the wall construction is not known, except for present wall construction which is concrete. The Annex was wood frame, but Cenveo has not been able to determine wall construction.

See the schematic drawings in Exhibit 10 for locations where raw materials were stored. Also see Exhibit 20 which contains schematic drawings showing additional raw material storage.

As to the types of raw materials, please refer to Exhibit 10 for the Chemical Inventory. This exhibit was an attachment to a 1998 Contingency Plan, and is a fair representation of the types and names of materials that the facility has utilized over the years.

Also see Exhibit 15, a 1989 Environmental Status Report, that provides a snapshot of the environmental issues at GAC for that year. The report also includes MSDS sheets, effluent information, permit information, raw materials usage, UST information and other information relating to GAC and information on its environmental compliance.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: See the Report mentioned in Response No. 8.

Prior to the time GAC moved out of the "triangle building," the 90-day

area was closed. See Exhibit 16.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- a. the location and nature of each sewer line, drain, ditch, or tributary;
 - b. the date of construction of each sewer line, drain, ditch, or tributary;
 - c. whether each sewer line, or drain was ever connected to a main trunk line;
 - d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo is without knowledge as to whether any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharge or have in the past discharged into the Willamette River. This property is not on the Willamette River.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: See GAC's spill plans attached hereto as Exhibits 17 and 18. Also see Exhibit 19 wherein City of Portland personnel indicate that the only runoff from GAC to the City's stormwater system is on the north side of the GAC property. Also see Exhibit 20 for an additional GAC spill plan.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: GAC can best be described as a high-end commercial printing operation specializing in such things as annual reports and other high-impact publications. GAC/Flexoprep historically supplied film and film developing services to the printing industry, but has only been on the main GAC property since September 2005.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:
- in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
 - the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: GAC generated solid waste and hazardous waste, and disposed of it offsite pursuant to statutes and regulations in effect at the time of disposal.

(a) For many of the years during which GAC has operated at the facility, records are no longer in existence. However, some waste manifests have survived from which information was taken. Cenveo has also referred to annual waste surveys to help summarize the GAC waste streams and quantities. Cenveo is not aware of purchase records except those from the recent years that show what materials were purchased. See Exhibit 21. However, please see Exhibit 10, mentioned in the response to Request 16, which shows the types of materials GAC had on site in 1998. The GAC/Flexoprep operation, for a short time after moving into the basement at GAC, recycled a waste made up of still bottoms generated from one of its processes. GAC/Flexoprep generates no other hazardous waste, and its non-hazardous solid waste is now part of GAC's non-hazardous waste stream. Silver continues to be generated and hauled for recycling purposes only.

(b) Please see Exhibit 22 which is a summary of waste that was disposed of from 1980 through 2008 along with some of the manifests from that same time period that have survived.

(c) The waste was generated by the processes in use at the GAC facility. It was disposed of in accordance with statute and regulations in effect at the time disposal took place. After RCRA was enacted, waste was stored on-site in the manner dictated by RCRA prior to disposal.

(d) The quantity of wastes generated is shown in the waste summary attached hereto as Exhibit 22. This summary was derived from surviving waste manifests and from annual hazardous waste surveys. Please see Exhibit 60 that contains raw material information compiled for reporting year 2003.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: This question is not applicable to Cenveo, GAC/Flexoprep or GAC. However, please see Exhibit 23 in which a spill is described that made its way to the Willamette River. This was during the time period Zehrung operated at the property. Cenveo is not certain if Zehrung owned the property in the 1960s at the time of the spill, or whether Zehrung leased the property from another entity.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: This question is not applicable to Cenveo.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: This question is not applicable to Cenveo.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Neither of the two longest employed supervisors/managers could recall any specific use of either pesticides or herbicides at or on the property. Neither of these two could recall the names of pesticides and/or herbicides that might have been used on the property.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: After RCRA was enacted, hazardous wastes that were to be transported off the property were staged in 90-day waste storage areas. Typically once each 30 days a waste hauler picks the waste up from 90-day storage areas

for shipment to a treatment or disposal facility. Non-hazardous waste is disposed of in approved landfills or incinerated.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:
- the persons with whom the Respondent made such arrangements;
 - every date on which Respondent made such arrangements;
 - the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
 - in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
 - in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
 - the owner of the materials involved in each such arrangement, if not Respondent;
 - all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
 - the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
 - the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
 - who selected the location to which the materials were to be disposed or treated;
 - who selected the Property as the location at which hazardous materials were to be disposed or treated; and
 - any records of such arrangement(s) and each shipment.

Response: To the best of Cenveo's knowledge, after reviewing manifests, interviewing current and former employees and reviewing thousands of pages of historical documents, neither Cenveo, GAC nor GAC/Flexoprep ever disposed of, nor arranged for the disposal of, any material in the Willamette River or to any property within the Investigation Area.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Please see the description of the GAC facility contained in the Phase I Report included as Exhibit 1. Also see the separate responses for each facility to which GAC had a nexus from its inception in 1967 until the present.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: See Exhibit 24.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: GAC has always been a high-end commercial printing company using the facility it now occupies since approximately 1967, including the addition to the facility that was constructed in the 1982 to 1985 time frame. GAC/Flexoprep produces and processes film for the commercial printing industry and has occupied the basement of the GAC building only since September 2005. There are no industrial, chemical or institutional processes undertaken at this location.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Over time, as automation increased and as business has evolved, GAC has become a smaller entity than it was when it first occupied the facility. While it once had several hundred employees, GAC's employment numbers now vary between 125 and 160. There is no specific date on which these changes occurred.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: In general, GAC uses ink, paper, cleaners and fixers in its printing processes. Products produced are completed printing projects. Some of the cleaners used by GAC over time have been recycled at the facility. Please see Exhibit 10 for a summary of the types of raw materials used in Respondents operations.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: See Exhibit 25 attached hereto.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response:

- a. Since GAC has used this facility since approximately 1967, the types of materials used to clean/maintain the equipment used by GAC include both solvent-based cleaners, non-solvent based cleaners and a variety of other materials.
- b. Cenveo has not determined a method to determine monthly or annual usage.
- c. Any of the materials used in the GAC facility could have been spilled.
- d. Materials used to clean up liquid spills included absorbent ropes (mini-booms) and pigs.
- e. Methods used to clean up spills included soaking up the released material.
- f. If the material spilled was not a hazardous waste, then it was disposed of as solid waste. If the material that was spilled was hazardous in nature, and could not be reused in the process, then it was disposed of as a hazardous waste. Cenveo is not aware that any material spilled in GAC's facility was ever disposed of at any landfill or other facility within the Target Investigation area. Current environmental management at GAC indicates that GAC has never had a release of a reportable quantity of material.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: See Response No. 34.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;

- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Please see Exhibit 22 which includes a summary of wastes and copies of waste manifests that Cenveo has identified.

- f. Cenveo is not aware of when each type of waste was first produced at the facility, or how long specific wastes were generated.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Please see the schematic drawing in Exhibit 20, Bates page PHSS-Sec 45 – 0892 that shows the various areas of the GAC facility, and Bates page PHSS-Sec 45 – 0894 that shows where the various types of wastes are generated.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: During GAC's early existence, there apparently was no single person appointed to supervise environmental matters. In 1982, Chuck Wilson was employed as the Maintenance Head. Mr. Wilson's responsibilities included oversight of environmental matters, although Mr. Wilson rarely had a hands-on relationship with waste disposal issues. Mr. Wilson was employed in this capacity until he left GAC in March 1997. Nial Weber was employed as the Maintenance Manager from October 1996 until July 2002 and had some environmental responsibility, just as did Mr. Wilson. Mark Smith was employed by Cenveo/GAC from April 2006 until December 2006 as a Maintenance Supervisor with some environmental responsibilities. Dan Mellon served as Corporate EH&S Manager overseeing the GAC operation from April 1997 until December 1999. Pat Shea was GAC's first Safety Director with environmental responsibilities serving from October 1989 until January 1994. Ken Metro was GAC's EH&S Coordinator from September 1997 until June 2000. Jeff Anderson became GAC's EH&S Coordinator in May 2000 and served until April

2006. Missy Otis has served as GAC's Quality and Safety Manager with environmental responsibilities, with the help of Judy Dove, from December 2006 until the present.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: For solid, non-hazardous waste, either Waste Management, Inc. or Emerald Services, Inc. has provided waste hauling services for GAC. For silver, Safety-Kleen Systems, Inc. has provided recycling services. Emerald Services, Inc. has also provided hauling of some material for recycling. Other disposal of hazardous wastes has taken place over the years, but Cenveo has been unable to identify related contracts. See Exhibit 26 for Waste Management, Inc.'s hauling agreements. Also see Exhibit 58 for Emerald Services, Inc.'s acknowledged quotes for recycling, treatment and disposal services.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, including, but not limited to the following:
- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - c. if Respondent transported any of its wastes away from its operations, please so indicate;
 - d. for each type of waste specify which Waste Carrier picked it up;
 - e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
 - f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
 - g. state the basis for and provide any documents supporting the answer to the previous question.

Response: a. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing manifests and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. Please see Exhibits 26 and 58 for hauling agreements. Notwithstanding Cenveo's objection, please

see the summary table and manifests at Exhibit 22 that disclose the disposal locations Cenveo has been able to identify.

b. Waste Carriers included Waste Management, Inc., Safety-Kleen Systems, Inc., Emerald Services, Inc., Northwest Transport, SLT Express, Chem-Security, Romic Chemical, Dart Trucking, Diamond J Transport, Savannah Transport, J.B. Hunt Special Commodities, Westway Motor Freight, Sturgeon and Son, Inc., Triad Transport, Inc., Tri-State Motor Transit Company and ORRICO.

c. Respondent did not transport any of its own wastes.

d. See Exhibit 22.

e. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing manifests and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. Notwithstanding Cenveo's objection, please see the summary table and manifests at Exhibit 22-that disclose the disposal locations Cenveo has been able to identify.

f. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing manifests and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. Notwithstanding Cenveo's objection, please see the summary table and manifests at Exhibit 22 that disclose the disposal locations Cenveo has been able to identify.

g. See response 40(f).

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;
- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and

- e. whether and what pretreatment was provided.

Response:

- a. The only material that was put into the drains at GAC would have been water from the developer processes. A portion of this water may have had very small amounts of silver in it from time to time, although the vast majority of the silver was removed by a silver removal process for recycling purposes. At all times, GAC has operated either under a permit or City of Portland authorization. Please also see the Dames & Moore Preliminary Assessment Report attached hereto as Exhibit 1 that provides much of the information requested herein.
- b. The developing process was an ongoing process, and disposal occurred on an as-needed basis.
- c. Please see Exhibit 61. Cenveo has no records for effluent discharges to the drains for times prior to those shown in the documents that are included in Exhibit 61. However, seasonal variations in business have caused fluctuations in the volume of effluent discharged to the drains in the past.
- d. Because silver had already been removed from the effluent, only pH adjustment of the effluent was sometimes needed. Upon information and belief, Respondent's waste which was and is disposed of in its drains goes to the City of Portland's POTW.
- e. Cenveo is not aware that any other pretreatment or treatment was provided or needed.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Upon information and belief, Respondent's waste which was and is disposed of in its drains goes to the City of Portland's POTW.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: To Cenveo's and GAC's knowledge, the only type of treatment wastes that were generated by GAC was the silver that was recycled.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: GAC did not use any PCBs in its processes. However, GAC did, from time to time, dispose of light ballasts that apparently contained PCBs. To the best of Cenveo's knowledge, and as set forth on some of the manifests included in Exhibit 22, none of the light ballasts used or disposed of by GAC leaked any material containing PCBs while on the GAC property.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: There was no activity or process that used PCBs. All light ballasts containing PCBs were replaced during re-lamping activities at the GAC facility.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. However, upon information and belief, as to environmental matters, GAC was and is regulated by U.S. EPA, Oregon DEQ and the City of

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Portland. GAC was and is also regulated by the Occupational, Safety and Health Act. See the documents provided in response to Request 51 that contain names with whom communications occurred over the years. In addition, the following persons were shown on communications not necessarily involving issues set forth in Request 51: Gregory D. Baesler (DEQ), Mark W. Hope (DEQ), Fred Hansen (DEQ), Loren G. Garner (DEQ), Susan Eidman (DEQ), Clark Niewendorp (Department of State Police), Sabrina Alberg Deal (City of Portland, Storm Water Section), Wendy Anderson (DEQ), Gerald Baumgartner (City of Portland, Environmental Services), David B. Berg (DEQ), Tom Bottenberg (City of Portland, Industrial Waste Section), Ruby N. Boyd (U.S. EPA), Jim Broad (DEQ), Roy Brower (DEQ), Daphne L. Bussey (DEQ), Eduardo G. Chiong (DEQ), Rebecca Christiansen (DEQ), Mark Copeland (DEQ), Nancy Couch (DEQ), Tim Crawford (U.S. EPA), Eric DeBerry (City of Portland, Environmental Services), Harry M. Demaray (DEQ), Harry Edmond (City of Portland, Industrial Waste Section), Henry Edwards (City of Portland, Environmental Services), Brian Finneran (DEQ), Carl Goebel (City of Portland, Bureau of Water Works), David Gooley, (City of Portland, Environmental Services), Benjamin Gossett (Portland Water Bureau), Greg Grunow (DEQ), William D. Hartford (DEQ), Jack Herbert, (DEQ), Bruce Henderson (DEQ), Kelly D. Hendryx (City of Portland, Environmental Services), Stephanie Holmes (DEQ), Laura Johnson (Bureau of Environmental Services), Barry E. Jones (Dept. of Ins. and Fin.), Susan Keil (City of Portland, Environmental Services), Mark Knudsen (City of Portland, Bureau of Water Works), Kevin Masterson (DEQ), Rick McGraw (Fire Marshall's Office, Station 3), Rosemary Nichols (DEQ), David J. Olsen (DEQ), Rebecca Paul (DEQ), Janette Petersen (U.S. EPA), William Preble (City of Portland, Bureau of Water Works), Anna R. Price (DEQ), Audrey O'Brien (DEQ), Richard Porter (DEQ), Rich Reiter (DEQ), Wesley C. Risher (DEQ), Jeff Sandberg (City of Portland, Environmental Services), Miquel Santana (City of Portland, Environmental Services), Bruce Schillo (U.S. EPA), Larry Schurr (DEQ), Edward Tenny (City of Portland, Bureau of Water Works), E. Patricia Vernon (DEQ), Rick Volpel (DEQ), Carol Weidner (City of Portland, Bureau of Water Works), Gerald T. Wilson (DEQ), and Mike Zollitsch, (DEQ).

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Dames & Moore mentioned several violations in its 1989 Preliminary Assessment. See the report attached hereto as Exhibit 1. The Dames & Moore report also contains pictures of the site, a list of chemicals stored at the site, a description of satellite storage areas, a description of effluent discharges and other information requested herein.

Pilko in its 1995 Environmental Assessment provided information relating to a xylene reporting violation based GAC's 1992 EPCRA Report. See Exhibit 27.

GAC entered into a Compliance Order with the City of Portland in November 1997 as a result of a silver exceedances during final compliance monitoring. See Exhibit 28.

GAC received NOV's in April 1998 from DEQ. A copy of the Notice and attachments thereto are include as Exhibit 29.

GAC received NOV's in 2004. Please see Exhibit 30.

GAC received NOV's in 1997. Please see Exhibit 31.

Upsets that occurred over the years at the GAC facility are included in Exhibit 59.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Please refer to Exhibits 15 and 32 in which Cenveo has included permits it has been able to identify impacting this facility.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: Yes. Please see Exhibit 33.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: To the best of its knowledge, GAC never had interim status at any of its facilities in the Portland area.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: The only number that Cenveo is aware of that was issued to GAC for this facility is ORD009051665.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Upon information and belief, GAC has never filed hazardous substance or hazardous waste information with a federal office under RCRA, other than the Hazardous Waste Notification referenced in Exhibit 33.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Upon information and belief, this facility has filed hazardous substance and/or hazardous waste information with either the Oregon Department of Environmental Quality or the Oregon Fire Marshall. It appears that such information would have first been filed in 1983 and then each year since then.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. Notwithstanding this objection, this facility has reported to either federal or state governmental agencies under the following laws related to environmental issues: TSCA, EPCRA, CAA, RCRA. Please see Exhibit 34.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Cenveo is not aware of any registrations, notifications, inspections or reports required to be filed by this facility.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between

Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: Not applicable.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- a. when such releases occurred;
 - b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - c. the amount of each hazardous substances, pollutants, or contaminants so released;
 - d. where such releases occurred;
 - e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - g. all persons with information relating to these releases; and
 - h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: See the Response to Request No. 6 where Cenveo describes remedial work that was performed to clean up contamination caused by Zehrung's operations on a portion of the property prior to GAC building a 1982-1985 addition onto the facility. In addition, based on sampling results taken when four (4) USTs were removed from the GAC property in 1989, some petroleum-based solvent release had occurred. Please see Exhibit 7 for a description

of the release and remedial activities. In both instances DEQ was notified and approved the remediation.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:
- where the disposal system or floor drains were located;
 - when the disposal system or floor drains were installed;
 - whether the disposal system or floor drains were connected to pipes;
 - where such pipes were located and emptied;
 - when such pipes were installed;
 - how and when such pipes were replaced, or repaired; and
 - whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: From the time GAC moved into the building, the only spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property was the discharge of process water to the sanitary sewer by or authorization by the City of Portland. Cenveo has not been able to identify any other spill, leak, release or discharge of any type that made its way to any subsurface disposal system or floor drain inside or under a building on the Property.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- amount of soil excavated;
 - location of excavation presented on a map or aerial photograph;
 - manner and place of disposal and/or storage of excavated soil;
 - dates of soil excavation;
 - identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - reason for soil excavation;
 - whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - all analyses or tests and results of analyses of the soil that was removed from the Property;

- i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
- j. all persons, including contractors, with information about (a) through (i) of this request.

Response: To Cenveo's knowledge, the soil removal undertaken by GAC after Zehrung vacated its former property and the soil removal associated with UST removal in 1989 are the only two times soil has been removed from any of the three parcels that now make up the facility. See Exhibits 1 and 7.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: To the best of Cenveo's knowledge, groundwater has never been sampled from beneath the facility.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. reason for groundwater action;
 - b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
 - c. all analyses or tests and results of analyses of the groundwater;
 - d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
 - e. all persons, including contractors, with information about (a) through (c) of this request.

Response: Not applicable.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - b. the dates of each such occurrence;
 - c. the amount and location of such release;
 - d. were sheens on the river created by the release;

- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: During the time GAC and/or GAC/Flexoprep have occupied this property, no spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river has occurred. This facility is not next to the Willamette River. However, please see Exhibit 23 which describes a release from this property *prior* to the time GAC had any nexus to this property.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Cenveo is not aware of any releases or threatened releases of PCBs at this facility.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: See Response No. 68 herein.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Cenveo is not aware of any inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air

quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Please see Cenveo's Response to Request 6 in which information is provided relating to the soil investigation and removal that occurred after Zehrunge vacated a portion of the property along with Exhibits 1, 5 and 6 that also contain information relating to this investigation and removal. Please also see Exhibit 7 which describes the removal of four USTs and associated petroleum contaminated soil.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: Please see the Response to Request No. 71 herein.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:
- what the nature and scope of these investigations will be;
 - the contractors or other persons that will undertake these investigations;
 - the purpose of the investigations;
 - the dates when such investigations will take place and be completed; and
 - where on the Property such investigations will take place.

Response: Cenveo is not planning any type of investigation at the GAC property.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a

business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;

- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response:

- a. Cenveo Corporation is a Delaware corporation.
- b. While Cenveo Corporation was initially a privately-held corporation (for less than two years), it was taken public in September 1995 and has remained a public corporation since then. The most up-to-date list of Cenveo's Board of Directors and primary Officers can be accessed at <http://www.cenveo.com/investors/governance.asp>. Each of the Directors and Officers can be reached through counsel listed in Cenveo's Response to Request 2 herein.
- c. Please see the Response to Request No. 5 herein.
- d. Please see the Response to Request No. 5 herein.
- e. Cenveo has no agreements or arrangements with any landlords or premises owners for properties to which Cenveo has had some nexus that are in the Investigation Area.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Please see the Response to Requests No. 1, 2 and 5 herein. Cenveo, Inc. is the parent company of Cenveo Corporation, and operates at the same address as Cenveo Corporation. Cenveo's registered agent in Oregon is Corporation Services Company ("CSC"). The address is 285 Liberty Street NE, Salem, OR 97301. The CSC phone number is 1-800-222-2122.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: Please see Exhibit 35.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Responses:

- a. Prior to Mail-Well Corporation's formation in 1994, Mail-Well Envelope had operated as a wholly-owned subsidiary of Great Northern Nekoosa and later Georgia-Pacific. Cenveo is not aware of the degree of control exercised by the parent companies at any given time prior to Mail-Well Corporation's formation in 1994. Please also see Response 75 contained herein.
- b. Upon information and belief, Great Northern Nekoosa became a part of Georgia-Pacific in approximately 1990. Cenveo does not know when Mail-Well Envelope became a part of Great Northern Nekoosa.
- c. Cenveo is a publically traded corporation listed on the New York Stock Exchange.
- d. See Response to Request 75 herein.
- e. Cenveo will provide such insurance policies if liability is established, when said policies are identified and if there is coverage under said policies.

- f. Cenveo's corporate financial disclosure forms are public information available from the Securities & Exchange Commission.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Cenveo is a publically-held corporation.

Section 9.0 Compliance With This Request

79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

- a. the name and current job title of all individuals consulted;
- b. the location where all sources reviewed are currently reside; and
- c. the date consulted.

Response: Preliminary research regarding identification of relevant facilities began shortly after Cenveo received EPA's 104(e) Request. Information was provided informally by current GAC employees during interviews with Mr. Popovics during his visit to Portland on April 10, 2008. Interviews by counsel were conducted on April 16, 2008, April 21, 2008, April 23, 2008, April 25, 2008, April 30, 2008, May 5, 2008, and on subsequent days as needed. Mr. Benjamin and Mr. Webber reside in the Portland area. Mr. Williamson resides in the St. Louis, MO area. All can be contacted through counsel listed in Cenveo's Response to Request 2. Environmental managers Missy Otis and Judy Dove identified relevant documents at the 2000 NW Wilson Street facility on April 10, 2008. These documents were reviewed by Mr. Popovics and counsel between then and the date this response was submitted to U.S. EPA to determine which documents were response to EPA's requests.

80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from, each Property identified in response to Question 4.

Response: Cenveo has reviewed lists of current and former employees at its facilities in and around the Portland area, and believes that the people previously identified in this response have the required information for each facility

identified in Cenveo's response to Request No. 4. However, Cenveo understands that if it identifies any additional responsive information, it is under an obligation to disclose such information to EPA.

81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. the document retention policy between 1937 and the present;
 - b. the approximate date of destruction;
 - c. a description of the type of information that would have been contained in the documents;
 - d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and
 - e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.

Response:

- a. Cenveo has not been able to identify a document retention policy at any of the facilities covered by this response until the time Mail-Well purchased GAC. See Exhibit 36 for a 2000 document retention policy.
- b. Cenveo has been informed by current employees that shortly after GAC was first acquired by Mail-Well in 1995, Mail-Well took steps to bring GAC under the same document retention policy as other Mail-Well entities. During this process, documents dated prior to seven years before the acquisition date were discarded, except for some permanent real estate documents and other corporate historical documents as well as some environmental documents deemed to be important to the Corporation. This document retention policy has been enforced by Mail-Well, and later Cenveo, since that time.
- c. Upon information and belief, many contract documents, hazardous waste manifests, and other documents created during day-to-day operations were discarded during this process. Cenveo has not identified any method by which it can learn precisely what documents were discarded under Mail-Well's document retention policy, and Cenveo has yet to identify a copy of a GAC document retention policy that was in effect at the time Mail-Well purchased GAC. No documents that could be responsive to EPA's 104(e) request have been destroyed or otherwise discarded since Cenveo received EPA's 104(e) request.

- d. Cenveo has consulted with each manager of its production facilities in the Portland area. Cenveo believes that it has identified each and every responsive document that has survived until present day. However, Cenveo understands that if it identifies any additional responsive documents, it is under an obligation to disclose such information to EPA.
- e. Cenveo is not aware of any person who has other responsive documents other than those that have been reviewed and produced.

82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.

Response: To the best of its knowledge, Cenveo has produced all records in its possession that relate to EPA's questions contained in its 104(e) request.

INSTRUCTIONS

1. Answer Each Question Completely. Provide a separate answer to each question and subpart set forth in this Information Request. Please provide responses to all the questions in this Information Request for each Property identified in response to Question 4 of Section 2.0, when appropriate. For each Response clearly identify the Property or Properties to which the response applies. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject the Respondent to the penalties set out in the cover letter.
2. Response and Copies of Documents Must be on Paper (hard copy). Provide the responses to this Information Request and at least one copy of all requested documents on hard copy paper.

There is a Portland Harbor PRP search website:

(<http://yosemite.epa.gov/R10/CLEANUP.NSF/7d19cd587dff1eee8825685f007d56b7/75e7f27bd108f3eb88256f4a007ba018!OpenDocument>) that lists documents in the Superfund program's files related to certain facilities or parties. You do not need to provide a copy of a document that appears on the list if EPA has a complete copy. If a document is on EPA's list, you still must provide a complete Response to each question in this Information Request and, if necessary in order to completely respond to a Question, describe the content of any document in EPA's files in your Response.

You may also provide a second copy of the response electronically on a compact disc, if you choose, in Portable Document Format (PDF) format. If possible, further format large documents as follows;

- a. Bookmark documents longer than 10 pages for easier navigation (e.g., chapters);
 - b. Ensure that file/document properties/initial view is for "bookmarks panel and page" if there are bookmarks.
 - c. For document composed of multiple files, link together with a starter file that is less than 2 MB, i.e., the document's executive summary. The executive summary should have a bookmarks panel with bookmark links to the other files. Ensure that all files are saved to the same folder, rather than multiple folders so that the linkage is retained.
 - d. Bookmarks to other files should indicate the name of that file (and size of that file, if over 1 MB).
 - e. "Tag" the document for accessibility if this was not done by the source application (advanced/accessibility/tag).
 - f. Enter document properties: 1) title, author (should be XXXX for EPA Region 10), 2) subject, and 3) keywords.
3. Number Each Answer. Number each answer with the number of the question to which it corresponds.

4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.
5. Identify Information Sources. For each question, identify all persons and documents relied upon for the answer.
6. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. ' ' 9604(e)(7)(E) and (F), and 40 C.F.R. ' 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." A confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. ' ' 2.201-2.311. If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice.
7. Disclosure to EPA Contractor. Information submitted in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if the Respondent asserts that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If submitting information and asserting it is entitled to treatment as confidential business information, the Respondent may comment on EPA's intended disclosure within 14 days of receiving this Information Request.
8. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from responses, included on separate sheet(s), and marked as "Personal Privacy Information". Note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice.
9. Objections. The Respondent must provide responsive information notwithstanding objections to certain questions. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.
10. Privilege. If a privilege is asserted for any document responsive to this Information Request, identify (see Definitions) the document and provide the basis for assertion. If a privilege exists for only a portion of a document, provide the portion of the document that is not asserted be privileged, identify the portion that is asserted to be privileged, and provide the basis for asserting privilege. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

11. Declaration. The Respondent must complete the enclosed declaration, certifying the accuracy of all statements in your response.

DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. ' 9601, *et seq.*, or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean the addressee of this Request, together with the addressee's officers, managers, agents, employees, contractors, trustees, successors, assigns, and any predecessor or successor corporations or companies.
2. The term "business activities" shall mean all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Property, including surveying, sampling, grading, documentation, photography, demolition, construction, and waste disposal, and sales.
3. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include, but not be limited to:
 - a. writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, email or fax transmittals;
 - ii. any film, photograph, or sound recording on any type of device;
 - iii. meeting minutes, telephone records, notebooks;
 - iv. agreements and contracts;
 - v. reports to shareholders, management, or government agencies;
 - vi. transportation manifests;
 - vii. copies of any document;
 - viii. report, notices, analysis, notebook.
 - b. any blueprints or drawings; and
 - c. attachments to, or enclosures with, any document.
4. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position, or business.
5. The term "identify" means, with respect to a corporation, partnership, business trust, or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
6. The term "identify" means, with respect to a document, to provide: (a) its customary

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business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. Alternatively, Respondent may provide a complete copy of the document.

7. The term “Investigation Area” refers to the area in and adjacent to the Willamette River in which EPA is currently conducting its PRP search and is bounded to the North by the confluence of the Columbia Slough, approximately River Mile 1.7 and bounded to the South at River Mile 12 and bounded to the East by a line following N Lombard St. to N Columbia Blvd. to Chimney Park to N. Commando Ave. to N Lombard St. to N Reno Ave. to N Edison St. to N Catlin Ave to N Decatur St. to N Baltimore Ave. to N Crawford St. to N Polk Ave. to N Willamette Blvd. to N Greeley Ave to N Interstate Ave. and bounded to the West by a line following NW Gillihan Rd. on Sauvie Island to Columbia River Hwy 30 to NW St. Helens Rd. to NW Nicolai St. to NW Vaughn St. to NW Thurman St. to NW 14th Ave. to NW Raleigh St. to NW 13th Ave. to NW Pettygrove St. to NW 12th Ave to NW Overton St. to NW 9th Ave. to NW Lovejoy St. to NW Broadway to NW Glisan St. Additionally, the area included between the Columbia River Hwy 30 and Forest Park is included in the definition of Investigation Area. See attached Investigation Area Map for a visual depiction of the Investigation Area.
8. The term "material" or "materials" shall mean any and all raw materials, commercial products, wastes, oil, petroleum, chemicals, substances, or matter of any kind.
9. The "period being investigated" and "the relevant time period" shall mean 1937 to present.
10. The term “Property(ies)” shall refer to any and all real or personal property within the Portland Harbor Investigation Area that Respondent owns, leases, manages, operates, has an easement on, or otherwise has an affiliation, or previously owned, leased, managed, operated, had an easement on, or otherwise had an affiliation during the period being investigated. The term Property includes aquatic lands owned, leased, or otherwise controlled by Respondent. Please note that you must answer the Questions in this Information Request related to properties outside the Investigation Area if Question 4, Section 2.0 specifically instructs you to.
11. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including, but not limited to, containers for temporary or permanent holding of wastes, building debris and asbestos-containing material.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on _____, 2008.

Signature

Timothy M. Davis
Type or Print Name

Senior Vice President, General Counsel and Secretary
Title

Mailing Address:

Section 2.0 Owner/Operator Information (Annex/Triangle/Glacier Park Property)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This property is the Annex to 2116 NW 20th Avenue, Portland Oregon. It will be referred to as the Annex herein. GAC leased the property from Pennbrook/Pflueger beginning in 1989 as a sub-lessee, although it is not clear from whom Pennbrook/Pflueger leased the property. Upon information and belief, Burlington Northern Railroad owned the Annex. See below.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: The Annex, sometimes referred to in documents as the Glacier Park property, the triangle property or the triangle building, is adjacent to the north of the 2116 NW 20th Avenue property (The Glacier Park Company was a real estate subsidiary of Burlington Northern Railroad). There is a Burlington Northern Railroad ("BNR") spur on the property, and the property itself was owned by BNR. The property was leased to GAC in the same lease that conveyed the lease interest from Pflueger to GAC in 1989, and GAC continued to use the Annex until 2002. Both the lot and the wood frame building are triangular in shape, with the building having approximately 5,000 square feet of floor space. GAC used the Annex to store paper and finished goods as well as utilizing it for raw material storage and as a 90-day hazardous waste storage area. According to LSE's Phase I Preliminary Assessment (see Exhibit 48), there was a small equipment maintenance shop in the Annex prior to the time GAC first operated in the building. LSE also mentioned minor oil staining on the concrete and what looked to be a limited oil release on gravel nearby. Cenveo has not identified the Alternative Tax lot ID number for the Annex.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials

handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);

- c. any person subleasing land, equipment or space on the Property;
- d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
- e. major financiers and lenders;
- f. any person who exercised actual control over any activities or operations on the Property;
- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Cenveo has no knowledge regarding who had control over any portion of the Property, other than the prior lessee, Lumber Products, prior to the time Graphic Arts leased the Annex, although upon information and belief, BNR owned the Annex. After Graphic Arts leased the Annex, only Graphic Arts, and later Cenveo, has had the right to control operations at the Annex. Cenveo has no knowledge that any employee of Graphic Arts or Cenveo has ever had the right to control any of the operations at the Property except as allowed by Graphic Arts or Cenveo.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: At all times GAC's interest in the Annex was a leasehold interest. This interest first began in 1989 when the GAC leased the Iron Mountain facility and the Annex from Pflueger. It ended in 2002. GAC is not aware of what happened to the master lease or any other information after its leasehold interest ended in 2002. Please see the master lease attached hereto as Exhibit 51.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is not the current owner and/or operator, so this Request is not applicable.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: GAC was not aware of any hazardous substance, waste, or material disposed of on or at the Annex except for what was mentioned in the LSE Reports attached hereto as Exhibits 48, 49 and 50.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;
- b. all evidence showing that they controlled access to the Property; and
- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Cenveo has no additional information other than what is included in the Responses No. 4 and 5. Please also see the LSE Reports mentioned in Response 9.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of operation;
- b. the nature of prior operations at the Property;
- c. all evidence that they controlled access to the Property; and
- d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Cenveo has no additional information other than that provided in the LSE Reports. See Response 9 herein.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:

- a. property boundaries, including a written legal description;
- b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c. location of all underground pipelines whether or not owned, controlled or operated by you;
- d. surface structures (e.g., buildings, tanks, pipelines, etc.);
- e. over-water structures (e.g., piers, docks, cranes, etc.);
- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Please see the master lease (Exhibit 51) for the legal description of the Annex property. Cenveo has no additional information that is responsive to this Request, except that the wood framed building on the Annex property was constructed in approximately 1976 and was approximately 5,000 square feet in size. In addition, the only information Cenveo has about sewers in the area is set forth in LSE's October 17, 1989 letter report. See Exhibit 49. Note in this letter report that LSE indicates that DEQ records show that some type of a chemical release occurred at the BNR rail yard approximately one-half mile northwest of the Annex. There is also

a description of some type of sewer, probably a storm sewer, in this letter report.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Not applicable.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Cenveo has no information that is responsive to this Request except for the information in the LSE Reports. See Exhibits 48, 49 and 50.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo has no knowledge of any solid waste or other waste units. GAC at one time stored raw products in this facility, and utilized a portion of this facility as the 90-day storage area for the GAC facility. As to the raw materials stored in this facility during this same time frame, Cenveo has not located any information that

shows what materials were stored here, although upon information and belief, some raw paper products were stored in the Annex.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Any waste in the 90-day area was picked up and disposed of by the hauler being used at that time when the Annex was vacated. Raw products being stored in the Annex were transferred to the main GAC facility when the Annex was vacated. Neither GAC nor Cenveo is aware of any releases of any hazardous substances that occurred in or about the Annex during the time period GAC used the facility for storage purposes.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:

- a. the location and nature of each sewer line, drain, ditch, or tributary;
- b. the date of construction of each sewer line, drain, ditch, or tributary;
- c. whether each sewer line, or drain was ever connected to a main trunk line;
- d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
- e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo is without knowledge as to any information that would be responsive to this request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has not located any plans that apply to the Annex, or any studies responsive to this Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: GAC utilized the Annex for storage of hazardous waste in a 90-day storage area and raw materials in other portions of the building.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: Please see the Response for GAC's main facility and waste generated there. For a period of time, some of GAC's raw materials and hazardous wastes were stored in the Annex.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Not applicable.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: No specific use of herbicides or pesticides was recalled by GAC personnel.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Non-hazardous wastes were disposed of by a waste hauler. Hazardous wastes generated at the main GAC facility were stored in a 90-day storage area located in the middle of the Annex and were hauled from the Annex by the appropriate hazardous waste hauler.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;

- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: To the best of Cenveo's knowledge, after reviewing manifests, interviewing current and former employees and reviewing thousands of pages of historical documents, neither Cenveo nor GAC ever disposed of, nor arranged for the disposal of, any material in the Willamette River or to any property within the Investigation Area.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: The Annex was used for storing raw materials and as storage for hazardous waste from the main GAC facility in a 90-day storage area.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: There were no "operations" at this facility other than storage. Cenveo is unaware of any such diagram or flow chart.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: The Annex was first utilized in 1991 at the same time the Iron Mountain facility was leased from Pflueger, since the lease covered both facilities. The storage operation ended at the Annex in 2002. Hazardous waste storage ended there in 1998.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Neither the nature nor the size of the operation changed over time until hazardous waste was no longer stored in the Annex in 1998, and until GAC vacated the Annex in 2002.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: Please refer to the response for the 2000 NW Wilson Street facility. The raw materials and waste materials at the Annex were those used by or generated by the GAC facility.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: GAC personnel do not recall any MSDS sheets other than the same ones that were kept at the GAC facility during the same time frame. Please see the MSDS sheets referred to in the response for the main GAC facility.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: There was no equipment or machinery at the Annex, although some GAC personnel thought there might have been some type of metal cutting apparatus at the Annex. GAC personnel could not recall any types of spills that occurred at the Annex.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable for the Annex.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;

- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: This facility produced no waste except for minor amounts of non-hazardous waste. Please see the Response for GAC's main facility at 2000 NW Wilson Street since hazardous waste generated by the main facility was stored for a time at the Annex.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Please see Response No. 36 herein.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Please see Response 38 in the Response for 2000 NW Wilson Street.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Please see Response No. 36 herein.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:
- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - c. if Respondent transported any of its wastes away from its operations, please so indicate;
 - d. for each type of waste specify which Waste Carrier picked it up;

- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing manifests and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. In addition, please see Response No. 36. Hazardous waste stored at the Annex was manifested by GAC.

Notwithstanding Cenveo's objection, hazardous waste stored at the Annex was manifested by GAC, and has been included in the hazardous waste summary. Please see Exhibit 22.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
- a. the nature and chemical composition of each type of waste;
 - b. the dates on which those wastes were disposed;
 - c. the approximate quantity of those wastes disposed by month and year;
 - d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
 - e. whether and what pretreatment was provided.

Response: GAC personnel are not aware of any wastes or other materials disposed of in any drains from the Annex.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: GAC personnel did not recall any equipment that might have contained PCBs at the Annex. In its Phase I Property Assessment prior to the time GAC utilized the Annex, LSE opined that some of the light fixtures might contain PCBs.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from

agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Omni Environmental, on behalf of GAC, communicated with Ms. Susan Eidman at Oregon DEQ in 1998 when GAC asked that RCRA ID No. ORD987189230 be cancelled for the 2116 NW 20th Avenue address. The RCRA identification number was also included on TRI Reporting Form R for xylene for 1996. The report was sent to the EPCRA Reporting Center, not to any specific person's attention.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: GAC personnel do not recall any violations relating to the Annex facility.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Cenveo is not aware of any permits issued to the Annex.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: Cenveo is not aware that any Hazardous Waste Activity Notification under RCRA was ever submitted to any agency, although Cenveo assumes that such a notification would have been made prior to issuance of the RCRA identification number assigned to the address. GAC filed Registration Verification Reports with Oregon DEQ for at least the years 1992 through 1998.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: To the best of its knowledge, GAC never had interim status at any of its facilities in the Portland area.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Generator No. ORD987189230 was assigned to 2116 NW 20th Avenue.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: To the best of its knowledge, GAC did not submit any hazardous substance or hazardous waste information to any federal offices for the Annex.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: To the best of its knowledge, GAC did not submit any hazardous substance or hazardous waste information to any state offices for this facility, except for the Registration Verification Reports mentioned in the Response to Request 53 contained herein.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: To the best of its knowledge, GAC did not submit any hazardous substance or hazardous waste information for the Annex pursuant to the laws and regulations listed in this Request, except as set forth in Response 57.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: To the best of its knowledge, Cenveo is unaware of any reports required at the Annex pursuant to any PCB-related statutes and/or regulations.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: To the best of its knowledge, Cenveo is unaware of any incident involving leased state aquatic lands. The Annex is not an aquatic land.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Cenveo is unaware of any leaks, spills, or releases into the environment of any waste at or from the Annex.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: Cenveo is unaware of any spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on or at the Annex. However, please see Exhibits 48 and 50 which identify apparent oil releases at the Annex (Glacier Park Building in the LSE Report) prior to GAC operating there.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. amount of soil excavated;
- b. location of excavation presented on a map or aerial photograph;
- c. manner and place of disposal and/or storage of excavated soil;
- d. dates of soil excavation;
- e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
- f. reason for soil excavation;
- g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
- h. all analyses or tests and results of analyses of the soil that was removed from the Property;
- i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
- j. all persons, including contractors, with information about (a) through (i) of this request.

Response: To the best of Cenveo's knowledge, no contaminated soil has ever been excavated or removed from the property.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: To the best of Cenveo's knowledge, no groundwater testing has ever been conducted at the Annex.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: To the best of Cenveo's knowledge, no treatment, pumping or any other kind of response action has ever been taken on groundwater at the Annex.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;
- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: To the best of Cenveo's knowledge, no spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River ever occurred from any equipment, structure, or

activity occurring on, over, or adjacent to the river that had any relationship whatsoever to the Annex.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Cenveo is not aware of any release or threatened release of PCBs at or from the Annex.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Cenveo is not aware of any release or threatened release of PCBs at or from the Annex.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Cenveo is not aware of any inspections, evaluations, safety audits, correspondence or any other documents associated with the conditions, practices, and/or procedures at the Annex concerning insurance issues or insurance coverage matters.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: To the best of Cenveo's knowledge, there have never been any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about the Annex.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If

not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: No agent or consultant of GAC's or Cenveo's has ever undertaken any remediation or response action at the Annex.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: Cenveo no longer has a nexus to the Annex; therefore, no investigation of any kind is planned for any media at the Annex by Cenveo.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);
- b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
- c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: GAC leased the Annex as described above. Please see information in Cenveo's response for 2000 NW Wilson Street. There are no

arrangements with any entity regarding environmental liability at the Annex.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: GAC leased the Annex. Later GAC was merged into a Mail-Well entity as described in the Response relating to GAC's main facility at 2000 NW Wilson Street. Please see Cenveo's response for the main GAC facility located at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: Please see the response for GAC's main facility at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- the dates such relationship existed;
- the percentage of ownership of Respondent that is held by such other entity(ies);
- for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation,

total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (Creative Mailing Services on Swan Island)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: The Creative Mailing Services ("CMS") facility was next door to the Swan Island Property, and apparently operated at the same time as did the Swan Island Property. CMS was also used for storage, separating and mailing.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: GAC leased the CMS facility in the early 1980s, and used it as storage for paper as well as for sorting and staging of outgoing mail. Like the Swan Island Property beside it, CMS was used until the time GAC was able to move into the Iron Mountain warehouse facility directly across NW 20th Avenue from GAC's main facility at 2000 NW Wilson Street in 1991. Cenveo/GAC personnel are not certain as to the legal relationship to the property. Apparently GAC leased the CMS property, possibly from a person named Fred Haase, who was an employee of GAC in the same time frame. Since GAC typically leased its warehouse facilities, and can find no evidence that GAC ever had a fee simple interest in the CMS facility, it is probable that GAC leased the CMS facility. GAC does not know what happened to the CMS facility after GAC moved out in 1991.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;

- f. any person who exercised actual control over any activities or operations on the Property;
- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Other than believing the landlord might have exercised some amount of control over the CMS property, Cenveo has no information that is responsive to this Request.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Please see Cenveo Response to Request 5 herein.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Not applicable.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Cenveo has no information that is responsive to this Request.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of ownership;
 - b. all evidence showing that they controlled access to the Property; and

- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than the information included in Cenveo's Response to Request 5 herein, Cenveo has no other information that is responsive to this Request.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of operation;
 - b. the nature of prior operations at the Property;
 - c. all evidence that they controlled access to the Property; and
 - d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Cenveo has no information that is responsive to this Request.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- a. property boundaries, including a written legal description;
 - b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c. location of all underground pipelines whether or not owned, controlled or operated by you;
 - d. surface structures (e.g., buildings, tanks, pipelines, etc.);
 - e. over-water structures (e.g., piers, docks, cranes, etc.);
 - f. dry wells;

- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Cenveo has no information that is responsive to this Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Not applicable. The CMS facility was not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Cenveo has no information that is responsive to this Request, but doubts that any such report, information or data was ever generated for the CMS facility.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo has no information that is responsive to this Request.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Cenveo has no information that is responsive to this Request.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- a. the location and nature of each sewer line, drain, ditch, or tributary;
 - b. the date of construction of each sewer line, drain, ditch, or tributary;
 - c. whether each sewer line, or drain was ever connected to a main trunk line;
 - d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo has no information that is responsive to this Request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans,

or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no information that is responsive to this Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response Please see Cenveo's Response to Request 5 herein.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: To the best of Cenveo's knowledge, the only operation that GAC had at the CMS property was storage of paper and storage and staging of outgoing mail. Please see Cenveo's Response to Request 5 herein.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Not applicable.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure,

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including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Cenveo has no information that is responsive to this Request.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Cenveo has no information that is responsive to this Request, although Cenveo is not aware that CMS would have had any type of waste disposal.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;

- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: Cenveo has no information that is responsive to this Request, although Cenveo is not aware that any hazardous waste or waste containing any hazardous substances was ever generated at this warehouse location.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Please see Cenveo's Response to Request 5 herein.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Cenveo has no information that is responsive to this Request.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: Please see Cenveo's Response to Request 5 herein.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: Not applicable. Please see Cenveo's Response to Request 5 herein.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable, and Cenveo has no information that is responsive to this Request.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:

- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
- c. if Respondent transported any of its wastes away from its operations, please so indicate;
- d. for each type of waste specify which Waste Carrier picked it up;
- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Not applicable, and Cenveo has no information that is responsive to this Request.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
- a. the nature and chemical composition of each type of waste;
 - b. the dates on which those wastes were disposed;
 - c. the approximate quantity of those wastes disposed by month and year;

- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Cenveo has no information that is responsive to this Request.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Cenveo has no information that is responsive to this Request.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Not applicable.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: Not applicable.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: Not applicable.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Not applicable.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Not applicable.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: Not applicable.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- when such releases occurred;
 - how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - the amount of each hazardous substances, pollutants, or contaminants so released;
 - where such releases occurred;
 - any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - all persons with information relating to these releases; and
 - list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Not applicable.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:
- where the disposal system or floor drains were located;
 - when the disposal system or floor drains were installed;
 - whether the disposal system or floor drains were connected to pipes;
 - where such pipes were located and emptied;
 - when such pipes were installed;

- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: Not applicable.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Cenveo has no information that is responsive to this Request.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: Cenveo has no information that is responsive to this Request, but doubts that there ever would have been a reason to test groundwater under the CMS facility.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;

- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: Cenveo has no information that is responsive to this Request, but doubts that any kind of action on groundwater was ever taken.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - b. the dates of each such occurrence;
 - c. the amount and location of such release;
 - d. were sheens on the river created by the release;
 - e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: Not applicable.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Cenveo has no information that is responsive to this Request.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Cenveo doubts any such investigation would have occurred.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: Cenveo doubts that any remediation or response action was ever taken at the CMS facility.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
 - b. the dates such relationship existed;
 - c. the percentage of ownership of Respondent that is held by such other entity(ies);
 - d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
 - e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
 - f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (Front Avenue)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This Response is for the Front Avenue facility located at 1466 NW Naito Parkway, Portland. The address is just south of the point Front Avenue changes to Naito Parkway. It was a warehouse property.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: This was a warehouse property that was utilized in the early 1980s for a staging area for outgoing mail to the post office. Based on information supplied by current Cenveo employees, part of the facility was occupied by GAC for a short time period, probably fewer than two years. The property was between the railroad and the river, but did not have any dock to the river, at least for the portion of the building that GAC occupied. The building had two truck loading docks. Crescent Electric used the other half of the building. Crescent Electric was a supply company. Upon information and belief, Mount Hood Chemical was the facility owner. While Cenveo has not located any supporting documentation, current employees have indicated that the facility was leased by GAC from Mount Hood Chemical.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;
 - any person who exercised actual control over any activities or operations on the Property;

- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Please see Cenveo's Response to Request 5 herein. Cenveo has no additional information.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Cenveo has no interest in the property. GAC held a leasehold interest sometime in the early 1980s. See Cenveo's Response to Request 5 herein.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is not the current owner or operator.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Cenveo has no information that is responsive to this Request.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of ownership;
 - b. all evidence showing that they controlled access to the Property; and
 - c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than the information provided in Response to Request 5 herein, Cenveo has no information that is responsive to this request.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
- a. the dates of operation;
 - b. the nature of prior operations at the Property;
 - c. all evidence that they controlled access to the Property; and
 - d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Other than the information provided in Response to Request 5 herein, Cenveo has no information that is responsive to this request.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- a. property boundaries, including a written legal description;
 - b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c. location of all underground pipelines whether or not owned, controlled or operated by you;
 - d. surface structures (e.g., buildings, tanks, pipelines, etc.);
 - e. over-water structures (e.g., piers, docks, cranes, etc.);
 - f. dry wells;
 - g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
 - h. groundwater wells, including drilling logs;

- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;

- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- a. the location and nature of each sewer line, drain, ditch, or tributary;
 - b. the date of construction of each sewer line, drain, ditch, or tributary;
 - c. whether each sewer line, or drain was ever connected to a main trunk line;
 - d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Other than the information provided in the Response to Request 5, Cenveo has no information that is responsive to the Request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans,

or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: No, to the best of Cenveo's knowledge.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request. The warehousing operation did not involve hazardous substances.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure,

including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request. There would have been no hazardous waste generated by this warehousing operation.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;

- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: No, to the best of Cenveo's knowledge.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable to this facility.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: There were no raw materials or products manufactured, recycled, recovered, treated or otherwise processed at this facility, to the best of Cenveo's knowledge. Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:
- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - c. if Respondent transported any of its wastes away from its operations, please so indicate;
 - d. for each type of waste specify which Waste Carrier picked it up;
 - e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
 - f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
 - g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Not applicable.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
- a. the nature and chemical composition of each type of waste;
 - b. the dates on which those wastes were disposed;
 - c. the approximate quantity of those wastes disposed by month and year;
 - d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
 - e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: None, to the best of Cenveo's knowledge.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: None, to the best of Cenveo's knowledge.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: None, to the best of Cenveo's knowledge.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: No, to the best of Cenveo's knowledge.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: No, to the best of Cenveo's knowledge.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: None, to the best of Cenveo's knowledge.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: None, to the best of Cenveo's knowledge.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident,

accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: No, to the best of Cenveo's knowledge.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: None, to the best of Cenveo's knowledge.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;

- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: No, to the best of Cenveo's knowledge.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: No, to the best of Cenveo's knowledge.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: No, to the best of Cenveo's knowledge.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: No, to the best of Cenveo's knowledge.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;
- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: No, to the best of Cenveo's knowledge.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: None, to the best of Cenveo's knowledge.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: None, to the best of Cenveo's knowledge.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: None, to the best of Cenveo's knowledge.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);

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- b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
- c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (2116 NW 20th Avenue; "Iron Mountain" facility)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: The property address for this facility is 2116 NW 20th Avenue, Portland, Oregon.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: The 2116 NW 20th Avenue facility was the last of several warehouses used by the GAC operation prior to the time GAC was able to consolidate its operations into its main facility that it still operates at 2000 NW Wilson Street. The 2116 NW 20th Avenue is commonly known to GAC personnel as the "Lumber Products" property or the "Iron Mountain" property, and will be referred to as such throughout this response. The Iron Mountain property is directly across NW 20th Avenue from GAC's main facility at 2000 NW Wilson Street in Portland. The property was acquired by GAC from Lumber Products in 1989 and then sold to and leased back from Pflueger Properties. Lumber Products subleased the property from GAC until Lumber Products' new facility was available for occupation. It appears that GAC first occupied the property in 1991. GAC vacated the property in 1999, and the property was sold to Iron Mountain.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- a. partners or joint venturers;
 - b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - c. any person subleasing land, equipment or space on the Property;
 - d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - e. major financiers and lenders;

- f. any person who exercised actual control over any activities or operations on the Property;
- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Except as set forth below as it applies to a sub-lessee, Cenveo has no knowledge regarding who had control over any part of the Property, other than the owner from whom GAC leased the property, during the time GAC had a nexus to the 2116 NW 20th Street property. During the time Graphic Arts had a nexus to the property, Cenveo has no knowledge that any employee of Graphic Arts or Cenveo ever had the right to control any of the operations at the Property except as allowed by Graphic Arts or Cenveo, except for the short period during which Lumber Products subleased the property from GAC until Lumber Products new facility was available for occupation.

Cenveo apparently contracted with several construction companies to remodel several areas in the building, but it is not clear that any of the contractors had the right to control any significant portion of the building and/or property during the renovation activities.

Beginning in September 1997, while GAC leased the 2116 NW 20th Street property from Pflueger,¹ GAC subleased a portion of the property to Centric Corporation. Centric leased 36,511 square feet of the building beginning in September 1997, to be used for the storage and distribution of paper products. The lease was scheduled to terminate on December 31, 2001.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: GAC owned the 2116 NW 20th Street property for a very short time after GAC purchased the property from Lumber Products in 1989, and had a

¹ Pflueger is sometimes referred to as Pflueger, while sometimes the company is referred to as Pennbrook Development Company/Pflueger Partners. In some documents, Pflueger is at times spelled Pfleuger. A 1998 Registration Verification Report shoes Pflueger's address to be 1001 Bishop Pacific Tower 2690, Honolulu, HI 96813. Centric's mailing address at the time it executed its lease was PO Box 3068, Portland, OR 97208-3068. {00018763; 1}

leasehold interest after GAC sold the property to Pflueger in 1989 until GAC vacated the property in 1999.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is not the current owner or operator of the 2116 NW 20th Street property.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Prior to the time GAC purchased the property and sold it to Pflueger for a leaseback arrangement, GAC engaged Lambier Stevenson Engineers ("LSE") to conduct a Phase I Preliminary Assessment. Please see the LSE report attached hereto as Exhibit 48. In connection with the LSE assessment, a search was undertaken to locate an underground storage tank ("UST") allegedly present on the property. This UST was not located. See Exhibits 49 and 50 for additional information. Exhibit 50 primarily deals with the "Annex" (Glacier Park Property), but also contains some information relating to the Iron Mountain property.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;
- b. all evidence showing that they controlled access to the Property; and
- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than the prior ownership information included in the LSE assessment (see Exhibit 48), and related contamination information in the initial report and follow-up report also included as part of Exhibit 49, Cenveo is unaware of responsive information to this request.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of operation;
- b. the nature of prior operations at the Property;
- c. all evidence that they controlled access to the Property; and
- d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Please see Cenveo's Response to Request No. 10 herein.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable to this property.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:

- a. property boundaries, including a written legal description;
- b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c. location of all underground pipelines whether or not owned, controlled or operated by you;
- d. surface structures (e.g., buildings, tanks, pipelines, etc.);
- e. over-water structures (e.g., piers, docks, cranes, etc.);
- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and

m. all aerial photographs of the Property in your possession.

Response:

- a. See Exhibit 51.
- b. Cenveo has not been able to locate documents that contain descriptions of underground utilities at 2116 NW 20th Avenue.
- c. Cenveo has not been able to locate documents that show the location of any underground pipelines at 2116 NW 20th Avenue.
- d. See Exhibit 52 for a diagram of the warehouse.
- e. Not applicable.
- f. Cenveo has no knowledge of dry wells at this property.
- g. To the best of Cenveo's knowledge, there were no treatment devices at this facility since it was only warehouse space.
- h. To the best of Cenveo's knowledge, there were no groundwater wells at this property.
- i. Cenveo has not identified any documents that contain information with which to respond to the Request.
- j. to the best of Cenveo's knowledge, there were no underground structures on the property while GAC occupied the building. Lambier Stevenson Engineers opined in a 1989 Phase I Preliminary Assessment Report that there probably was an UST at the site at some prior time, but that it had been removed. Lambier Stevenson also stated that it had not found anyone who actually recalled the UST being at the facility, and had not found anyone who recalled anything about a removal. See Exhibit 49.
- k. While GAC owned and/or leased the property at 2116 NW 20th Avenue, inside renovations and an addition of a loading dock took place. Previously, in approximately 1969, fire burned all or most of the building, which was later replaced. See Exhibit 48.
- l. See Exhibit 52.
- m. Please see Exhibit 13 which contains aerial photographs of the area surrounding the main GAC facility, including the Iron Mountain facility.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: This property is not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response The only reports that deal with soil are the Lambier Stevenson report and updates that discuss stained soil near the railroad spur. As this property was used as a warehouse during GAC's nexus to the property, no other studies were performed. See Exhibits 48, 49 and 50.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: To the best of Cenveo's knowledge, there were no solid waste management units or areas where materials were managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on this property.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Not applicable.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- the location and nature of each sewer line, drain, ditch, or tributary;
 - the date of construction of each sewer line, drain, ditch, or tributary;
 - whether each sewer line, or drain was ever connected to a main trunk line;
 - whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - the areas serviced by the outfalls; and
 - the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo is not aware of the location of sewer lines running from the property, and therefore does not know if any lines discharge into the Willamette River. This facility was used by GAC as a warehouse facility.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no documents that are responsive to this request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: GAC operated a warehouse at the 2116 NW 20th Avenue. In addition, there was a small maintenance shop in the warehouse consisting of a lathe, welder, drill press and miscellaneous hand tools for maintaining press equipment at the GAC facility across NW 20th Avenue.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: There would have been small amounts of materials purchased for use in the maintenance shop, but any waste was non-hazardous in nature. Cenveo has no records that indicate how much material was purchased for the maintenance shop, and no material was used in the remainder of the facility as the facility was used to store paper. Safety-Kleen maintained a parts washer at the 2116 NW 20th Avenue facility.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Not applicable.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: No significant use of herbicides or pesticides was recalled by GAC personnel.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Solid waste was stored in solid waste receptacles until regularly scheduled pickups occurred.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: To the best of Cenveo's knowledge, none of the non-hazardous waste generated and disposed of from this facility while GAC owned and/or operated there went to any disposal location within the Investigation Area.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: This facility was a warehouse. It had a loading dock addition constructed on the north side in the early 1990s.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: There were no "operations" at this facility other than warehousing and some maintenance activities, so Cenveo is unaware of any such diagram or flow chart.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: This was a warehouse location. Warehousing by GAC began in 1991 and ended in 1999.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: As more warehousing took place in GAC's main facility on NW Wilson Street, the scope of warehousing decreased at this facility, allowing GAC to sublease a portion of the facility to Centric in 1997.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: The only raw materials involved at this facility would have been paper products and small quantities of materials used in the maintenance shop.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Cenveo believes that a limited number of MSDS sheets would have been kept in the small maintenance shop but has been unable to identify specific MSDS sheets from the Iron Mountain facility.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:
- the types of materials used to clean/maintain this equipment/machinery;
 - the monthly or annual quantity of each such material used;
 - the types of materials spilled in Respondent's operations;
 - the materials used to clean up those spills;
 - the methods used to clean up those spills; and
 - where the materials used to clean up those spills were disposed of.

Response: The cleaning of the equipment used in the maintenance shop was accomplished with the help of a Safety Kleen parts washing machine that contained solvent recycled and replaced by Safety Kleen. Cenveo is not aware of any material spilled in this facility as it was used as a warehouse facility for paper stock.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Cenveo is not aware of any spills of liquid or solid materials at this warehouse facility.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
- its physical state;
 - its nature and chemical composition;
 - its color;
 - its odor;
 - the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
 - the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: No waste other than generic solid waste was generated from this facility. The solid waste would have contained debris from the maintenance shop as well as debris from the warehousing operation. None of the waste was hazardous in nature, and to the best of Cenveo's knowledge, did not contain any hazardous substances.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

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Response: See Cenveo's Response to Request No. 36 herein.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Since there was no hazardous waste generated at this facility, there were no employees charged with overseeing waste disposal. The disposal was handled by the same non-hazardous solid waste disposal company that serviced GAC.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: The same non-hazardous waste hauler used by GAC was engaged to haul non-hazardous solid waste from the former Lumber Products building on a regular schedule. This would have included Waste Management, Inc. and Emerald Services, Inc.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:
- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - c. if Respondent transported any of its wastes away from its operations, please so indicate;
 - d. for each type of waste specify which Waste Carrier picked it up;
 - e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
 - f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
 - g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. Notwithstanding its objection,

Cenveo has not located any documents for this facility that show disposal locations. This facility was a warehouse, and any waste generated at this facility was non-hazardous in nature.

To date, Cenveo has not located any separate contract documents that addressed waste hauling activities from the 2116 NW 20th Street facility. See Response 39 contained herein.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
- the nature and chemical composition of each type of waste;
 - the dates on which those wastes were disposed;
 - the approximate quantity of those wastes disposed by month and year;
 - the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
 - whether and what pretreatment was provided.

Response: To the best of Cenveo's knowledge, no waste of any type was placed in drains and/or sewer at the 2116 NW 20th Ave. warehouse facility.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Cenveo is not aware that any federal, state or local authorities regulated this facility for waste issues.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Cenveo is not aware of any violation, citation, deficiency, and/or accident concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please

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provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Cenveo is not aware of any permits that were issued to the 2116 NW 20th Avenue facility.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: GAC did not file a Hazardous Waste Activity Notification under RCRA for this property. However, a generator number was issued for the Annex to the 2116 NW 20th Avenue facility because the Annex was used as a 90-day storage area for waste generated by the main GAC facility. Cenveo has not been able to locate the notification.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: To the best of its knowledge, GAC never had interim status at any of its facilities in the Portland area.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: The ID Number for the Annex was ORD987189230. See separate response for the Annex for additional information.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: To the best of Cenveo's knowledge, GAC did not send or file hazardous substance or hazardous waste information with any federal office for this facility.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: To the best of Cenveo's knowledge, GAC did not send or file hazardous substance or hazardous waste information with any state office for this facility.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Cenveo is not aware that GAC reported to any federal or state agency under any of the laws and regulations listed above.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Cenveo is not aware of any PCBs that were at the facility. However, the LSE Report indicated that some of the light ballasts may contain PCBs. See Exhibit 50.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: Not applicable.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- when such releases occurred;
 - how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - the amount of each hazardous substances, pollutants, or contaminants so released;
 - where such releases occurred;
 - any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - all persons with information relating to these releases; and
 - list all local, state, or federal departments or agencies notified of the release, if applicable.

Responses: Cenveo is not aware of any leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from this property.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:
- where the disposal system or floor drains were located;
 - when the disposal system or floor drains were installed;
 - whether the disposal system or floor drains were connected to pipes;
 - where such pipes were located and emptied;
 - when such pipes were installed;
 - how and when such pipes were replaced, or repaired; and
 - whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: Cenveo is not aware of any spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or

contaminant into any subsurface disposal system or floor drain inside or under the building on this property.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Cenveo never excavated or removed any contaminated soil from this property.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: Cenveo never tested any groundwater under this property.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and

- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: Cenveo never treated, pumped, or took any kind of response action on groundwater under this property.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;
- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: As from or relating to this facility, Cenveo is not aware that there was any spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the River. This property is not adjacent to the River.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: No release or threatened release of PCBs occurred while GAC owned or operated on this property.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: While GAC owned or operated the property, no inspections, evaluations, or safety audits were conducted at the Property concerning insurance issues or insurance coverage matters.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: During the time GAC owned or operated at this property, no investigation of soil, groundwater, surface water, sediment, geology, hydrology or air quality was conducted at this property. Prior to the time GAC purchased the property, a Phase I Preliminary Assessment was performed by Lambier Stevenson Engineers. This was not a focused assessment of any specific media, but rather a review of the property in general. Subsequent investigations were focused on determining whether an underground storage tank had ever been installed at the property, and if it had, was it ever removed. See Exhibits 48, 49 and 50.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: GAC conducted no remediation or response action while it owned or operated this property.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;

- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: Neither GAC nor Cenveo has any nexus to this property at this time, and therefore does not plan any work at or on the property.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);
- b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
- c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: GAC and/or Cenveo owned and or operated the property between 1989 and 1999. GAC was purchased by Mail-Well Commercial Printing, Inc. in August 1995, and was merged into Mail-Well Commercial Printing, Inc. on January 1, 2000. Later, Mail-Well Commercial Printing, Inc.'s name was changed to Cenveo Commercial, Inc., and Cenveo Commercial, Inc. was merged into Cenveo Corporation on January 25, 2005.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:

- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
- b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

- c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Cenveo was formerly known as Mail-Well Corporation and Mail-Well I Corporation. It was first incorporated as a Delaware corporation in 1994. Mail-Well had no independent existence prior to its 1994 incorporation as a Delaware corporation.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: See Exhibit 35, although Cenveo now has no nexus to the Iron Mountain facility.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (North Parking Lot)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This response is for the North Parking Lot located diagonally across the intersection of NW York Street and NW 20th Avenue from the northeastern corner of the main GAC facility at 2000 NW Wilson Street.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: Upon information and belief, the North Parking Lot was part of the Annex property originally owned by Burlington Northern or its real estate subsidiary, Glacier Park. During the late 1990s, the North Parking Lot was split off from the southern portion of the Annex property. It appears that GAC may have first had a leasehold interest in this property, but that leasehold interest became a fee simple interest in the late 1990s. The Alternative Tax ID Number is R237053. Cenveo now has a fee simple interest in the North Parking Lot property.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;
 - any person who exercised actual control over any activities or operations on the Property;
 - any person who held significant authority to control any activities or operations on the Property;
 - any person who had a significant presence or who conducted significant activities

at the Property; and

- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Other than the previous owner, Cenveo is not aware of entities who might have had actual control of activities at the North Parking Lot.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Upon information and belief, Cenveo/GAC received this property as part of a real estate trade in the late 1990s in which Cenveo/GAC received the North Parking Lot and Pflueger received the Annex, or rights thereto.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Other than information contained in the Pilko Report, Exhibit 27, Cenveo is not aware of any hazardous or other material placed at any time on this property. GAC and Cenveo/GAC have always used the North Parking Lot for just that, parking.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: No. Cenveo/GAC had access to the Pilko Report prior to the time it obtained the North Parking Lot. Other than that report, Cenveo is not aware of any other study performed at any time on the North Parking Lot.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
 - a. the dates of ownership;
 - b. all evidence showing that they controlled access to the Property; and

- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than Burlington Northern Railroad, Cenveo is unaware of any other owners of the North Parking Lot.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of operation;
- b. the nature of prior operations at the Property;
- c. all evidence that they controlled access to the Property; and
- d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Other than information provided in Responses 5, 7 and 8 herein, Cenveo is unaware of information responsive to Request 11.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:

- a. property boundaries, including a written legal description;
- b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c. location of all underground pipelines whether or not owned, controlled or operated by you;
- d. surface structures (e.g., buildings, tanks, pipelines, etc.);
- e. over-water structures (e.g., piers, docks, cranes, etc.);
- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;

- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Please see Exhibit 56 which shows the North Parking Lot as the piece of real estate marked as Roman numeral "II" in the figure. Cenveo has not yet identified a legal description for the North Parking Lot, and has no additional information responsive to this Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Not applicable.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Other than the information contained in the Pilko Report, Exhibit 27, Cenveo has no responsive information.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if

possible, and clearly indicate the location and size of all past and present units/areas;

- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo is not aware of any solid waste management units or areas where materials are or were managed, treated, or disposed of in the past.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Not applicable.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:

- a. the location and nature of each sewer line, drain, ditch, or tributary;
- b. the date of construction of each sewer line, drain, ditch, or tributary;
- c. whether each sewer line, or drain was ever connected to a main trunk line;
- d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
- e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo is not aware of the locations of any drains or sewers that might service this property, and has no information relating to whether any such drains discharge into the Willamette River.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water

runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no responsive documentation.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: The North Parking Lot has always been used as a parking area since GAC first had a nexus to it.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: No.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Not applicable.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated

with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.
26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Not applicable.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:
- the persons with whom the Respondent made such arrangements;
 - every date on which Respondent made such arrangements;
 - the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
 - in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
 - in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
 - the owner of the materials involved in each such arrangement, if not Respondent;
 - all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
 - the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
 - the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
 - who selected the location to which the materials were to be disposed or treated;

- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: Not applicable.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: The North Parking Lot was and is a parking area, and that is the only use that GAC or Cenveo/GAC has ever had for this piece of property.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Not applicable.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: This property is a parking lot.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: Not applicable.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;

- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:

- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
- c. if Respondent transported any of its wastes away from its operations, please so indicate;
- d. for each type of waste specify which Waste Carrier picked it up;
- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Not applicable.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;
- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: None.

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51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: None.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: None.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: No.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: No.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: None.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: None.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Not applicable.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: None.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: No.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: None.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: No.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. amount of soil excavated;
- b. location of excavation presented on a map or aerial photograph;
- c. manner and place of disposal and/or storage of excavated soil;
- d. dates of soil excavation;
- e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;

- f. reason for soil excavation;
- g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
- h. all analyses or tests and results of analyses of the soil that was removed from the Property;
- i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
- j. all persons, including contractors, with information about (a) through (i) of this request.

Response: No.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: No.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: No.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;

- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: No.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: None.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: None.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance

plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: None.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:
- a. what the nature and scope of these investigations will be;
 - b. the contractors or other persons that will undertake these investigations;
 - c. the purpose of the investigations;
 - d. the dates when such investigations will take place and be completed; and
 - e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:

- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
- b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
- c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and

otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (NW 19th Avenue and NW Thurman Street)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This property was near the corner of 19th NW Avenue and NW Thurman Street, with an address of 1825 NW Thurman Street (referred to herein as the "Thurman Property"). It was also a warehouse facility.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: This warehouse facility was being used as early as 1979, and was possibly used until the time the Swan Island and CMS facilities were used, although it is not clear whether it was used simultaneously with the Front Avenue facility. There may have been some relationship between the City of Portland and the Thurman Property as the City parked vehicles next door, and one current employee thought that GAC actually leased the Thurman Property from the City of Portland.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;
 - any person who exercised actual control over any activities or operations on the Property;
 - any person who held significant authority to control any activities or operations on the Property;
 - any person who had a significant presence or who conducted significant activities at the Property; and

- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Please see Cenveo's Response to Request 5 herein. Cenveo has no additional information.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Cenveo has no interest in the property. GAC apparently had a leasehold interest sometime in the early 1980s, and possibly earlier. See Cenveo's Response to Request 5 herein.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is not the current owner or operator.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Cenveo has no information that is responsive to this Request.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;
- b. all evidence showing that they controlled access to the Property; and
- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than the information provided in Response to Request 5 herein, Cenveo has no information that is responsive to this request.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
- the dates of operation;
 - the nature of prior operations at the Property;
 - all evidence that they controlled access to the Property; and
 - all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Other than the information provided in Response to Request 5 herein, Cenveo has no information that is responsive to this request.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- property boundaries, including a written legal description;
 - location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - location of all underground pipelines whether or not owned, controlled or operated by you;
 - surface structures (e.g., buildings, tanks, pipelines, etc.);
 - over-water structures (e.g., piers, docks, cranes, etc.);
 - dry wells;
 - treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
 - groundwater wells, including drilling logs;
 - storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;

- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: This property is not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
 - b. dated aerial photograph of the site showing each unit/area;
 - c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
 - d. the dates that the unit/area was in use;

- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:

- a. the location and nature of each sewer line, drain, ditch, or tributary;
- b. the date of construction of each sewer line, drain, ditch, or tributary;
- c. whether each sewer line, or drain was ever connected to a main trunk line;
- d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
- e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: No, to the best of Cenveo's knowledge.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request. The warehousing operation did not involve hazardous substances.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request. There would have been no hazardous waste generated by this warehousing operation.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;

- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: No, to the best of Cenveo's knowledge.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable to this facility.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: There were no raw materials or products manufactured, recycled, recovered, treated or otherwise processed at this facility, to the best of

Cenveo's knowledge. Other than the information provided in the Response to Request 5 herein, Cenveo has no information that is responsive to the Request.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:

- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
- c. if Respondent transported any of its wastes away from its operations, please so indicate;
- d. for each type of waste specify which Waste Carrier picked it up;
- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Not applicable.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;

- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: None, to the best of Cenveo's knowledge.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: None, to the best of Cenveo's knowledge.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: None, to the best of Cenveo's knowledge.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: No, to the best of Cenveo's knowledge.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: No, to the best of Cenveo's knowledge.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: None, to the best of Cenveo's knowledge.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: None, to the best of Cenveo's knowledge.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between

Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: No, to the best of Cenveo's knowledge.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: None, to the best of Cenveo's knowledge.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;

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- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: No, to the best of Cenveo's knowledge.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: No, to the best of Cenveo's knowledge.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: No, to the best of Cenveo's knowledge.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;

- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: No, to the best of Cenveo's knowledge.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - b. the dates of each such occurrence;
 - c. the amount and location of such release;
 - d. were sheens on the river created by the release;
 - e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: No, to the best of Cenveo's knowledge.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: None, to the best of Cenveo's knowledge.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: None, to the best of Cenveo's knowledge.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: None, to the best of Cenveo's knowledge.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

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- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);
- b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
- c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
- d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
- e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: See Cenveo's Response for the GAC facility at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;

- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (2187 NW Reed Street)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: GAC/Flexoprep operated at 2187 NW Reed in Portland from 1998 until approximately September 2005.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: In 1994, Rono Graphic Communications ("Rono") purchased an entity known as Trade Litho Company, which owned the rights to the trade name "Flexoprep." Trade Litho had been operating at the 2187 NW Reed Street address prior to the time Rono purchased Trade Litho. In 1996, Trade Litho and a related entity, Hicks-Chatten, merged their operations at the 2187 NW Reed Street address. In 1998, Mail-Well purchased assets from Rono which allowed Mail-Well to use the Flexoprep trade name and to operate GAC/Flexoprep at the 2187 NW Reed Street address. This was the first point in time that GAC had any nexus to 2187 NW Reed Street. At all subsequent times, Mail-Well's (later Cenveo's) interest in the 2187 NW Reed facility was a leasehold interest. Upon information and belief, the landlord was Clyde Thornburg, president of Trade Litho, Inc., although it appears the property owner was CET Enterprises, Inc., 521 Desert Holly Drive, Palm Desert, CA 92211. CET Enterprises apparently was a "LLC" in 2004, using an address of 19313 Moon Mountain Court, Bend, OR 97702. See Exhibit 37. Neither Cenveo nor GAC is aware of any hazardous waste disposal that occurred from this facility after Mail-Well purchased the Rono assets in 1998. Non-RCRA waste, not DOT regulated, was hauled by Conway Freight to Ross Incineration in Grafton, Ohio. See Exhibit 38.

GAC/Flexoprep provides film and film developing services to the print industry.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- a. partners or joint venturers;
 - b. any contractor, subcontractor, or licensor that exercised control over any materials

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handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);

- c. any person subleasing land, equipment or space on the Property;
- d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
- e. major financiers and lenders;
- f. any person who exercised actual control over any activities or operations on the Property;
- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Cenveo has no knowledge regarding who had control over any parcel of the Property, other than the landlord and/or the previous owner, while GAC/Flexoprep operated at 2187 NW Reed Street. Cenveo has no knowledge that any employee of Graphic Arts or Cenveo has ever had the right to control any of the operations at 2187 NW Reed Street except as allowed by Graphic Arts or Cenveo.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Cenveo's interest in 2187 NW Reed Street from 1998 through approximately September 2005 was always a leasehold interest. The lease was terminated when Cenveo vacated the property in 2005. Upon information and belief, GAC assumed the lease for 2187 NW Reed Street in 1998 when it purchased the Rono assets, although specific lease assumption documents have not been located. Please see the July 11, 1994 lease attached hereto as Exhibit 39. Please also see the lease termination letter and authorization for a month-to-month tenancy attached hereto as Exhibit 40. GAC/Flexoprep remained in the building pursuant to the month-to-month tenancy until September 2005. Please see Exhibit 41 for lease extension from 1999 until 2004.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is neither the current owner nor a current operator of the property at 2187 NW Reed Street.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: At the time Mail-Well first leased the 2187 NW Reed Street property, the Company did not know of any hazardous substance, waste, or material disposed of at the property itself. Cenveo has no knowledge that any hazardous substance, waste, or material was disposed of on, or at the Property. Mail-Well conducted environmental due diligence prior to purchasing assets from Rono, and no environmental issues were brought to Mail-Well's attention.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;
- b. all evidence showing that they controlled access to the Property; and
- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Cenveo does not know who any previous owner was at the 2187 NW Reed Street property, other than CET Enterprises as stated in Response 5. See Exhibit 37. However, Cenveo has been told that an entity called Sun Pen *may* have had some ownership interest in the property prior to CET Enterprises.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of operation;
- b. the nature of prior operations at the Property;
- c. all evidence that they controlled access to the Property; and

- d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Upon information and belief, Trade Litho operated at the 2187 NW Reed Street prior to the time Mail-Well acquired the rights to the Flexoprep name. Cenveo does not know how long Trade Litho operated at the 2187 NW Reed Street property. Trade Litho also provided film and developing services, but Cenveo is not certain what other operations, if any, were part of the Trade Litho operations. In addition, please see Cenveo's Response to Request 9.

Hicks-Chatten may have also operated at the property from 1996 until Mail-Well purchased assets of Rono, but Cenveo is not aware of what, if any, operations actually belonged to Hicks-Chatten.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: This Request is not applicable to the 2187 NW Reed Street property.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- a. property boundaries, including a written legal description;
 - b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c. location of all underground pipelines whether or not owned, controlled or operated by you;
 - d. surface structures (e.g., buildings, tanks, pipelines, etc.);
 - e. over-water structures (e.g., piers, docks, cranes, etc.);
 - f. dry wells;
 - g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
 - h. groundwater wells, including drilling logs;
 - i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;

- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Cenveo has no information for this Request except for the following:

- a. Please see Exhibit 39 for a legal description of the property.
- d. See Cenveo's Response to "l" below.
- i. See Exhibit 42 where parking lot runoff allegedly goes to a storm water drain.
- j. Upon information and belief, there were three USTs on the property, one gasoline UST and two oil USTs. These were not operated at any time by GAC/Flexoprep, but remained under the control of the owner. Also upon information and belief, all three USTs were removed from the property in 2003 or 2004. Soil sampling was performed, but GAC/Flexoprep and Cenveo are not aware of any results as this work was authorized by the owner, not GAC/Flexoprep.
- l. Please see the drawings of the facility at 2187 NW Reed Street attached hereto as Exhibits 43 and 44.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: The 2187 NW Reed Street property is not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Cenveo has not located any reports, information or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the 2187 NW Reed Street property.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
 - dated aerial photograph of the site showing each unit/area;
 - the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
 - the dates that the unit/area was in use;
 - the purpose and past usage (e.g., storage, spill containment, etc.);
 - the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
 - the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Please see the drawing included as Exhibit 44 which shows where various materials were stored. There were no waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc., other than what is shown on this drawing. Upon information and belief, the layout as shown in Exhibit 44 was the same from 1998 until GAC/Flexoprep vacated the facility in 2005. The floor was concrete.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: The entire operation was shuttered when GAC/Flexoprep moved out of the building in approximately September 2005. An entity called Kleen-Sweep cleaned up the facility, with GAC employees cleaning up the production areas. No hazardous substances were identified as having been left behind.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:

- the location and nature of each sewer line, drain, ditch, or tributary;

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- b. the date of construction of each sewer line, drain, ditch, or tributary;
- c. whether each sewer line, or drain was ever connected to a main trunk line;
- d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
- e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo is without knowledge that any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches or tributaries discharged into the Willamette River.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo no longer has copies of any studies or plans relating to the GAC/Flexoprep operation when it was at 2187 NW Reed Street property.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: GAC/Flexoprep's business included providing film and film developing services to the printing industry. This operation began when Mail-Well purchased assets from Rono in 1998 that included the right to use the Flexoprep trade name, and ended at 2187 NW Reed Street when the operation was moved to the basement at GAC's 2000 NW Wilson Street facility in September 2005. See Exhibit 45 for a summary of operations at GAC/Flexoprep.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;

- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: See Exhibit 46 for a summary of solvent usage from 1998-2005. See Exhibit 38 for descriptions of some of the wastes hauled from the facility.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: This Request is not applicable since the 2187 NW Reed Street is not over, on or adjacent to the Willamette River.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: This Request is not applicable since the 2187 NW Reed Street is not over, on or adjacent to the Willamette River.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: This Request is not applicable since the 2187 NW Reed Street is not aquatic land.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Cenveo has no knowledge of pesticide or herbicide use between 1998 and February 2000. No pesticides or herbicides were used at the facility

between February 2000 and September 2005 when GAC/Flexoprep vacated the facility.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: The GAC/Flexoprep portion of the business was [and is] a conditionally exempt hazardous waste generator, and disposed of no hazardous wastes during the time it operated at the 2187 NW Reed Street facility. Solid non-hazardous waste was hauled by Eckert Sanitary Service. No Eckert Sanitary Service documents have yet been located. Non-hazardous still bottoms have been hauled, mostly by Conway Freight under contract to DuPont, for incineration and/or fuel blending operations at Ross Incineration located in Grafton, Ohio. For a limited time (once, possibly twice) after GAC/Flexoprep moved into the 2000 NW Wilson Street facility in 2005, these still bottoms were hauled by another entity for recycling purposes. GAC/Flexoprep has not been able to identify the hauling and/or disposal company.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and

1. any records of such arrangement(s) and each shipment.

Response: To the best of Cenveo's knowledge, no waste from GAC/Flexoprep was ever disposed of in the Willamette River or at any other disposal facility within the Investigation Area.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: See Exhibits 43, 44 and 45.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: See Exhibit 45.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response:

- a. Cenveo's operations began at the 2187 NW Reed Street location when it purchased the rights to use the Flexoprep name in 1998. The operations ceased at that facility in approximately September 2005.
- b. GAC/Flexoprep provides film and film developing services for the printing industry. As such, it develops film and plates. See Exhibit 45.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: The nature or size of Cenveo's GAC/Flexoprep operation has not changed substantially since 1998.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: See Exhibits 45 and 46 along with Exhibit 38.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Please see Exhibit 47.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: a. See the Industrial and Commercial Environmental Survey attached hereto as Exhibit 42

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Spills would have been soaked up using absorbent materials. Personnel do not recall spills of solid materials.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: The only two waste streams from GAC/Flexoprep's operations contained solid, non-hazardous waste and liquid waste. The solid waste was hauled off site by solid waste haulers, and the liquid process waste water was sewered after silver was removed and after pH was adjusted, if needed. The volume of process waste water varied on a daily basis, but ranged for some number of years in the 200-250 gallon range per day. Cenveo is not able to

determine the volume of non-hazardous solid waste generated. See also Exhibit 42 which describes GAC/Flexoprep's waste streams.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: See Exhibits 44 and 46.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Typically the plant manager oversaw most of the environmental issues. For a number of years this individual was Scott Benjamin, who continues to be employed by GAC/Flexoprep as the manager.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: GAC/Flexoprep used Eckert Sanitary Service to pick up and dispose of the company's solid waste. Non-hazardous still bottoms generated from plate-making operations were picked up by a DuPont authorized carrier (Conway Freight) and hauled to Ohio on bills of lading for incineration and/or fuel blending.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, including, but not limited to the following:
- state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - if Respondent transported any of its wastes away from its operations, please so indicate;
 - for each type of waste specify which Waste Carrier picked it up;
 - indicate the ultimate disposal/recycling/treatment location for each type of waste;

- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response:

- a. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing bills of lading and interviewing current and former employees, none of the waste generated at GAC/Flexoprep was disposed of in the Willamette River or in the target investigation area. However, in addition to the non-hazardous waste hauled by Eckert (see below), a portion of GAC/Flexoprep's non-hazardous waste (still bottoms and associated drums) was hauled to Grafton, Ohio for incineration at Ross Incineration. Prior to 1994 (i.e., prior to the time Mail-Well purchased GAC and several years prior to GAC's asset acquisition that allowed GAC to use the Flexoprep name), this waste stream was considered hazardous and was shipped out on hazardous waste manifests. However, after PERC was removed from DuPont's Optisol line of products, the same waste stream was no longer considered to be a hazardous waste, so shipment took place on straight bills of lading.
- b. Eckert Sanitary Service hauled non-hazardous solid waste from GAC/Flexoprep. Conway Freight was the hauler engaged by DuPont to transport material generated in the plate-making operation to Ross Incineration in Grafton, Ohio.
- c. Respondent did not transport any of its own wastes.
- d. Upon information and belief, all solid, non-hazardous waste was hauled by Eckert Sanitary Service.
- e. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing bills of lading and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. However, see response to "f" below.

- f. Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. As Cenveo has stated above, to the best of its knowledge, after reviewing bills of lading and interviewing current and former employees, none of the waste generated at GAC was disposed of in the Willamette River or in the target investigation area. However, see Exhibit 38 that contains bills of lading and other waste documents showing the final location of incineration and/or disposal.
- g. Please see Exhibit 38.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;
- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

- Response:**
- a. The only waste material that was ever disposed of by Respondent in its drains was process water from the developer. This process waste water was first treated to remove silver, then was checked to see if the pH was acceptable.
 - b. Cenveo has no way to determine on which dates this type of disposal would have occurred.
 - c. Cenveo has no way to determine the quantities of this waste water which was sewered.
 - d. Upon information and belief, the sewer to which this wastewater was disposed would have been connected to the Portland POTW.
 - e. See response to "a" above.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.
{00018760; 1}

Response: Upon information and belief, GAC/Flexoprep's sewerage waste went to the Portland POTW.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: The only sludge from the pretreatment operation was silver which was picked up for recycling by Safety Kleen. GAC/Flexoprep also generated a sludge (still bottoms) from plate manufacturing processes that was picked up for incineration. This was not a DOT hazardous waste.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: This Request is not applicable to Cenveo.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: This Request is not applicable to Cenveo.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: This Request is not applicable to Cenveo.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Cenveo did not have any process or conduct any activity at the 2187 NW Reed Street property that involved the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of PCBs or PCB-containing materials or liquids.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: This Request is not applicable to Cenveo.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: This Request is not applicable to Cenveo.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. However, upon information and belief, as to environmental matters, GAC/Flexoprep was and is regulated by U.S. EPA, Oregon DEQ and the City of Portland. GAC/Flexoprep was and is also regulated by the Occupational, Safety and Health Act. Although GAC/Flexoprep was regulated by the above-mentioned agencies, the company had very little contact with any agency. To the best recollection of GAC/Flexoprep personnel, the company filed waste surveys with the State Fire Marshall. The company had no OSHA issues and no issues with environmental inspections. The facility did not have a waste generation number at any time after 1998.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence or information that is relevant to the Portland Harbor Superfund Site. EPA has included health and safety issues in this request that, for the most part, have nothing whatsoever to do with environmental issues in or near the Willamette River, and Cenveo's response does not include any health and safety issues unless those issues have some nexus to environmental issues. To the best recollection of GAC/Flexoprep, the company did not have any violations, citations, deficiencies, and/or accidents concerning the 2187 NW Reed Street property during the period when GAC/Flexoprep had a nexus to that site.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: GAC/Flexoprep did not have any permits as none was required.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: A waste generator number was at some time issued to the address, but this was before GAC/Flexoprep had any nexus to the facility. The number was ORD982654535.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: To the best of its knowledge, GAC never had interim status at any of its facilities in the Portland area.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: ORD982654535 was the Generator ID number at the 2187 NW Reed Street facility. It was not utilized after GAC became involved with Flexoprep.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: GAC/Flexoprep had no reporting requirements.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: For the 2187 NW Reed Street property, hazardous substance or hazardous waste information would have been filed with the Oregon Fire Marshall, although after GAC became involved in 1998, no waste classified as hazardous was generated and shipped from the 2187 NW Reed Street property.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Oregon Solid Waste Law.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: To the best of Cenveo's knowledge, there were no PCBs at the 2187 NW Reed Street facility.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: This property is not a state aquatic land.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: This property is not a state aquatic land.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or

from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Cenveo is not aware of any leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at 2187 NW Reed Street.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: The only discharges of waste from GAC/Flexoprep that Cenveo is aware of were the authorized discharges of process waste water after silver was removed and pH adjusted, if needed. These discharges would have gone to the sanitary sewer. Cenveo is not aware that any hazardous substances were in this process waste water. Cenveo is not aware that any of this process waste water

was ever discharged to any land or other subsurface disposal system.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Cenveo is not aware that any soil removal ever occurred at the 2187 NW Reed Street facility.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: Cenveo is not aware that any groundwater investigation has ever been conducted at the 2187 NW Reed Street property.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;

- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: Cenveo is not aware that any groundwater has ever been treated, pumped, or been the subject of any response action at 2187 NW Reed Street.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;
- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed. [is this correct??]

Response: The property at 2187 NW Reed Street is not adjacent to the Willamette River, and Cenveo is not aware of any spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from the 2187 NW Reed Street property.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: To the best of its knowledge, Cenveo does not believe there were any PCBs at the 2187 NW Reed Street property while GAC/Flexoprep operated there.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: This Request is not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Cenveo is not aware that there were any inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters at the 2187 NW Reed Street property.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Cenveo is not aware of any such investigations as are mentioned in Request 71 at the 2187 NW Reed Street facility.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: Cenveo is not aware of any remediation and/or response actions ever taken at the 2187 NW Reed Street property.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:
- what the nature and scope of these investigations will be;
 - the contractors or other persons that will undertake these investigations;
 - the purpose of the investigations;
 - the dates when such investigations will take place and be completed; and

- e. where on the Property such investigations will take place.

Response: Cenveo no longer has a nexus to the 2187 NW Reed Street property, and is not planning any investigations at or on said property.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response:

- Cenveo purchased the rights to use the Flexoprep name in 1998. The business was known thereafter as GAC/Flexoprep, although GAC/Flexoprep has never been a separate legal identity.
- Please see Cenveo's response contained in the main response for the GAC facility at 2000 NW Wilson Street.
- There has been no change in the entity known as GAC/Flexoprep. It has always been a part of the GAC business, although GAC was merged into Mail-Well Commercial Printing, Inc. on January 1, 2000. Mail-Well changed its name to Cenveo in 2004.
- Not applicable.
- There are no arrangements with the owner for any environmental contamination at the property. Cenveo is not aware that any contamination is at the 2187 NW Reed Street property.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Since Cenveo purchased the right to use the Flexoprep name in 1998, the business has always operated as GAC/Flexoprep, although to some it was just known as Flexoprep.

- The business continues to exist.
- GAC/Flexoprep is a trade name for the business used by Cenveo. The manager of GAC/Flexoprep is Scott Benjamin. Cenveo's registered agent in Oregon is Corporation Service Company ("CSC"), 285 Liberty Street NE, Salem, OR 97301. The CSC number is 1-800-222-2122.
- Not applicable.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: See Exhibit 35.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- the dates such relationship existed;
- the percentage of ownership of Respondent that is held by such other entity(ies);
- for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and

- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

- 78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rule the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (Small Gravel Parking Lot)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This response applies to the Small Gravel Parking Lot area west across NW 21st Avenue from the main GAC facility located at 2000 NW Wilson Street in Portland. The address for this parking area may have been 2135 NW 21st Avenue. There is some confusion about the address because some historical documents refer to 2116 NW Wilson Street, which, according to GAC personnel, has never had anything to do with the GAC operation. Street numbers between 2000 and 2200 apply to both north-south and east-west streets and avenues in this area, probably leading to this confusion.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: Cenveo knows very little about this parking area, other than knowing that some GAC personnel parked there during the 1980s and/or 1990s.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- a. partners or joint venturers;
 - b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - c. any person subleasing land, equipment or space on the Property;
 - d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - e. major financiers and lenders;
 - f. any person who exercised actual control over any activities or operations on the Property;
 - g. any person who held significant authority to control any activities or operations on the Property;
 - h. any person who had a significant presence or who conducted significant activities

at the Property; and

- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request. It is doubtful that GAC had any legal or equitable interest in the small parking area, and it is just as doubtful that GAC or Cenveo actually had any nexus to this property. It appears that some of GAC's personnel parked at this property just because nobody else was using it, and neither GAC nor Cenveo had any real nexus to the property. Cenveo has not found any record of any payments made for parking privileges or any other documents that provide a nexus to the property.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is not the current owner or operator of this small parking area.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:
- the dates of ownership;
 - all evidence showing that they controlled access to the Property; and
 - all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
- the dates of operation;
 - the nature of prior operations at the Property;
 - all evidence that they controlled access to the Property; and
 - all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: This small parking area is not an aquatic land.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:
- property boundaries, including a written legal description;
 - location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - location of all underground pipelines whether or not owned, controlled or operated by you;
 - surface structures (e.g., buildings, tanks, pipelines, etc.);
 - over-water structures (e.g., piers, docks, cranes, etc.);

- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: This property is not adjacent to the Willamette River.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Cenveo has no responsive information to this Request.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo has no responsive information to this Request.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Other than knowing this small parking area is no longer used by Cenveo/GAC, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
 - a. the location and nature of each sewer line, drain, ditch, or tributary;
 - b. the date of construction of each sewer line, drain, ditch, or tributary;
 - c. whether each sewer line, or drain was ever connected to a main trunk line;
 - d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no information that is responsive to this Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: This small area was used for parking by some of GAC's personnel.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: This property was not near the Willamette River. Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request. Upon information and belief, no wastes were generated at this small parking area.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;

- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request. Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.
- Response:** Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.
- Response:** Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.
- Response:** Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:
- the types of materials used to clean/maintain this equipment/machinery;
 - the monthly or annual quantity of each such material used;
 - the types of materials spilled in Respondent's operations;
 - the materials used to clean up those spills;
 - the methods used to clean up those spills; and
 - where the materials used to clean up those spills were disposed of.
- Response:** Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.
- Response:** Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.
36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
- its physical state;
 - its nature and chemical composition;
 - its color;
 - its odor;

- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:

- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
- c. if Respondent transported any of its wastes away from its operations, please so indicate;

- d. for each type of waste specify which Waste Carrier picked it up;
- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;
- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Cenveo is unaware that any operations and/or waste generation occurred at this small parking area.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health

and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: Not applicable. In addition, other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable. In addition, other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:

- a. when such releases occurred;
- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c. the amount of each hazardous substances, pollutants, or contaminants so released;
- d. where such releases occurred;
- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
- g. all persons with information relating to these releases; and
- h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. amount of soil excavated;
- b. location of excavation presented on a map or aerial photograph;
- c. manner and place of disposal and/or storage of excavated soil;
- d. dates of soil excavation;
- e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
- f. reason for soil excavation;
- g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
- h. all analyses or tests and results of analyses of the soil that was removed from the Property;
- i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
- j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- reason for groundwater action;
 - whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
 - all analyses or tests and results of analyses of the groundwater;
 - if the groundwater action has been completed, describe the basis for ending the groundwater action; and
 - all persons, including contractors, with information about (a) through (c) of this request.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - the dates of each such occurrence;
 - the amount and location of such release;
 - were sheens on the river created by the release;
 - was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: Other than knowing that some of GAC's employees parked in this small parking area, Cenveo has been unable to learn anything else about the area that is responsive to this Request.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:
- a. what the nature and scope of these investigations will be;
 - b. the contractors or other persons that will undertake these investigations;
 - c. the purpose of the investigations;
 - d. the dates when such investigations will take place and be completed; and
 - e. where on the Property such investigations will take place.

Response: Cenveo has no nexus to this property, and has no plans to perform any type of investigation at this property.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- a. state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - e. if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: Please see Cenveo's response for the main GAC facility.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

- c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Please see Cenveo's response for the main GAC facility.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: There was no operation at the small parking area. Otherwise, please see Cenveo's response for the main GAC facility.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
- b. the dates such relationship existed;
- c. the percentage of ownership of Respondent that is held by such other entity(ies);
- d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
- f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (South Parking Lot)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This response is for the South Parking Lot situated diagonally to the southeast from the main GAC facility located at 2000 NW Wilson Street in Portland.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: GAC purchased this property from Johnson Acoustical & Supply Co. ("JASCO") in September 1987. Thereafter it was sold to and leased back from Pflueger. The property has always been used as a parking lot by GAC and Cenveo/GAC. Later the property was transferred back to GAC, and is now owned by Cenveo. The Alternative Tax No. is R116957.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;
 - any person who exercised actual control over any activities or operations on the Property;
 - any person who held significant authority to control any activities or operations on the Property;
 - any person who had a significant presence or who conducted significant activities at the Property; and
 - any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Either Pflueger or GAC has controlled the property since the time GAC purchased the property from Johnson, although GAC did engage contractors to turn the property into a parking area for its employees after the purchase.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: As mentioned above, GAC had both a leasehold interest and a fee simple interest in the property, and Cenveo has a fee simple interest in the South Parking Lot.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Cenveo is the current owner of the property. The property was acquired after the seller removed an underground gasoline storage tank and excavated/removed approximately 50 cubic yards of gasoline-contaminated soil. DEQ inspected the tank removal and approved closure in August 1987. See the Pilko Report attached hereto as Exhibit 27. Also see Exhibit 53 that contains the request to dispose of this soil, the approval by DEQ and DEQ's inspection letter.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: See Cenveo's Response to Request No. 8 herein.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;
- b. all evidence showing that they controlled access to the Property; and

- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Other than the purchase date from JASCO as mentioned above, information relating to the gasoline UST mentioned above and information contained in the Pilko Report (Exhibit 27) and the 1989 Dames & Moore Report (see Exhibit 1), Cenveo has no other responsive information to this Request. It is not clear from the Dames & Moore Report whether Pacific Steel Foundry Company was an operator, owner or both at this property.

- 11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:
 - a. the dates of operation;
 - b. the nature of prior operations at the Property;
 - c. all evidence that they controlled access to the Property; and
 - d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: See Response 10 herein.

- 12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: This property is not an aquatic land.

Section 3.0 Description of Each Property

- 13. Provide the following information about each Property identified in response to Question 4:
 - a. property boundaries, including a written legal description;
 - b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c. location of all underground pipelines whether or not owned, controlled or operated by you;
 - d. surface structures (e.g., buildings, tanks, pipelines, etc.);
 - e. over-water structures (e.g., piers, docks, cranes, etc.);
 - f. dry wells;

- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;
- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response:

- a. A legal description is attached hereto as Exhibit 54.
- b-1. Please see the plans for the parking area attached hereto as Exhibit 55.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Not applicable.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Please see the Pilko Report attached hereto as Exhibit 27 and the Dames & Moore Report attached hereto as Exhibit 1. Other than these document, there are no other documents Cenveo is aware of that are responsive to this Request.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface

impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:

- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
- b. dated aerial photograph of the site showing each unit/area;
- c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
- d. the dates that the unit/area was in use;
- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo is not aware of any past or present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.), except for the gasoline UST information mentioned in the Pilko Report, Exhibit 27.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: See the information in the Pilko Report, Exhibit 27, as to UST closure.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:

- a. the location and nature of each sewer line, drain, ditch, or tributary;
- b. the date of construction of each sewer line, drain, ditch, or tributary;
- c. whether each sewer line, or drain was ever connected to a main trunk line;
- d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
- e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: The only information Cenveo has relating to this Request is contained on the plans attached hereto as Exhibit 55.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no information that is responsive to this Request for this property.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: This facility has always been used as a parking lot since GAC's first nexus to the property.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: Neither GAC nor Cenveo has ever generated or handled any waste or material at this property. This facility is a parking lot.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: This property is not on or adjacent to the Willamette River, and no operations have ever taken place at this property. This facility is a parking lot.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: No Cenveo or GAC personnel recalled any specific use of pesticides or herbicides at the facility.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: No wastes have been transported off this facility since GAC first had a nexus to the facility.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;

- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;
- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: No.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: This is a parking lot. No operations occurred here.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: No operations occurred here as this is a parking lot. Please see the drawings attached hereto as Exhibit 55.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: No operations took place at this facility. The facility is a parking lot.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: Not applicable.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable.

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:

- a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;
- b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
- c. if Respondent transported any of its wastes away from its operations, please so indicate;
- d. for each type of waste specify which Waste Carrier picked it up;
- e. indicate the ultimate disposal/recycling/treatment location for each type of waste;
- f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
- g. state the basis for and provide any documents supporting the answer to the previous question.

Response: No waste was generated at this parking lot.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- a. the nature and chemical composition of each type of waste;

- b. the dates on which those wastes were disposed;
- c. the approximate quantity of those wastes disposed by month and year;
- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Upon information and belief, there have been no contacts with any regulatory authorities relating to this property. The facility is a parking lot.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Not applicable.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Not applicable.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: No.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: No.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: None.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: None.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: None.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Not applicable.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident,

accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: No.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- a. when such releases occurred;
 - b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - c. the amount of each hazardous substances, pollutants, or contaminants so released;
 - d. where such releases occurred;
 - e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - g. all persons with information relating to these releases; and
 - h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Not applicable as to Cenveo or GAC. But see the Pilko report relating to the UST removed prior to GAC purchasing the property attached hereto as Exhibits 27, and soil removal documents attached hereto as Exhibit 53.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or

floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. where the disposal system or floor drains were located;
- b. when the disposal system or floor drains were installed;
- c. whether the disposal system or floor drains were connected to pipes;
- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: See Response 62 herein.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Please refer to the Pilko Report, Exhibit 27 and Exhibit 53.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: No.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- reason for groundwater action;
 - whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
 - all analyses or tests and results of analyses of the groundwater;
 - if the groundwater action has been completed, describe the basis for ending the groundwater action; and
 - all persons, including contractors, with information about (a) through (c) of this request.

Response: No.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:
- the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
 - the dates of each such occurrence;
 - the amount and location of such release;
 - were sheens on the river created by the release;
 - was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: No as to any time GAC has had a nexus to the property.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the

response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Please see the Pilko Report attached hereto as Exhibit 27.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Other than the Pilko Report, Exhibit 27, and Exhibit 53, Cenveo is unaware of any other responsive information to the Request.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: No actions by Cenveo and/or its agents have been taken.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: Please see information in Cenveo's response for 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Please see information in Cenveo's response for 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: Please see information in Cenveo's response for 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
 - b. the dates such relationship existed;
 - c. the percentage of ownership of Respondent that is held by such other entity(ies);
 - d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
 - e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
 - f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.

Section 2.0 Owner/Operator Information (Swan Island)

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

Response: This response covers a warehouse property that was located at 5150 North Basin Avenue, which is on what is known as Swan Island in Portland (this property will be referred to as the "Swan Island Property" in this response). This area used to be an actual island, but at some time in the past the waterway between the island and the mainland was filled in, so now there is no actual island left. The property is approximately three blocks from the Willamette River.

5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.

Response: GAC leased the Swan Island Property in the mid-1980s, and used it as storage for paper as well as for sorting and staging of outgoing mail. It was used until the time GAC was able to move into the Iron Mountain warehouse facility directly across NW 20th Avenue from GAC's main facility at 2000 NW Wilson Street in 1991. One current Cenveo/GAC employee recalled that the owner of the property was a person named Fred Meyer. Upon information and belief, a cold storage company either leased or purchased the property after GAC vacated the Swan Island Property.

6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:
- partners or joint venturers;
 - any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
 - any person subleasing land, equipment or space on the Property;
 - utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;
 - major financiers and lenders;
 - any person who exercised actual control over any activities or operations on the

Property;

- g. any person who held significant authority to control any activities or operations on the Property;
- h. any person who had a significant presence or who conducted significant activities at the Property; and
- i. any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.

Response: Cenveo has no specific information that is responsive to this request. However, upon information and belief, the only entity who would have had some level of control could have been the landlord, although Cenveo has no information that the landlord actually did exert any level of control over the premises while GAC leased the Swan Island Property.

7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).

Response: The only interest GAC had in the Swan Island Property was a leasehold interest as described in Cenveo's Response to Request 5 herein.

8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.

Response: Not applicable.

9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.

Response: Cenveo has no information that is responsive to this Request.

10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of ownership;

- b. all evidence showing that they controlled access to the Property; and
- c. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.

Response: Please see Cenveo's Response to Request 5 herein.

11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:

- a. the dates of operation;
- b. the nature of prior operations at the Property;
- c. all evidence that they controlled access to the Property; and
- d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property.

Response: Please see Cenveo's Response to Request 5 herein.

12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.

Response: Not applicable.

Section 3.0 Description of Each Property

13. Provide the following information about each Property identified in response to Question 4:

- a. property boundaries, including a written legal description;
- b. location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c. location of all underground pipelines whether or not owned, controlled or operated by you;
- d. surface structures (e.g., buildings, tanks, pipelines, etc.);
- e. over-water structures (e.g., piers, docks, cranes, etc.);
- f. dry wells;
- g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);
- h. groundwater wells, including drilling logs;

- i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;
- j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;
- k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;
- l. all maps and drawings of the Property in your possession; and
- m. all aerial photographs of the Property in your possession.

Response: Cenveo has no information that is responsive to this Request.

14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.

Response: Not applicable.

15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

Response: Cenveo has no information that is responsive to this Request.

16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:
- a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;
 - b. dated aerial photograph of the site showing each unit/area;
 - c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;
 - d. the dates that the unit/area was in use;

- e. the purpose and past usage (e.g., storage, spill containment, etc.);
- f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and
- g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.

Response: Cenveo has no information that is responsive to this Request.

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.

Response: Cenveo has no information that is responsive to this Request.

18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:
- a. the location and nature of each sewer line, drain, ditch, or tributary;
 - b. the date of construction of each sewer line, drain, ditch, or tributary;
 - c. whether each sewer line, or drain was ever connected to a main trunk line;
 - d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and
 - e. provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:
 - i. the areas serviced by the outfalls; and
 - ii. the type of outfall (i.e., storm water or single facility operational).

Response: Cenveo has no information that is responsive to this Request.

19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.

Response: Cenveo has no information that is responsive to this Request.

Section 4.0 Respondent's Operational Activities

20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation

or activity, the dates when each operation or activity was started and, if applicable, ceased.

Response: Please see Cenveo's Response to Request 5.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:
- in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
 - the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response: To the best of Cenveo's knowledge, the only operation that GAC had at the Swan Island Property was storage of paper and storage and staging of outgoing mail. Please see Cenveo's Response to Request 5 herein. However, during its review of documents, Cenveo identified one profile sheet for the disposal of 23 drums of waste roller and blanket wash. The profile contained the address for the Swan Island facility, but GAC's generator number. After discussing the profile sheet with Cenveo/GAC management personnel, it is clear that no printing or other operations took place at the Swan Island facility that would have generated this waste, and that this single profile sheet and possible disposal event was probably brought about by a short-term lack of storage space at GAC during a timeframe when business was growing. This lack of storage space, as well as the more remote location of the Swan Island storage facility, pushed GAC to obtain the Iron Mountain building for storage purposes at nearly the same time this profile sheet was filled out. See Exhibit 57.

22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.

Response: Not applicable.

23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.

Response: Not applicable.

24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.

Response: Not applicable.

25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 – present). Provide the brand name of all pesticides or herbicides used.

Response: Cenveo has no information that is responsive to this Request.

26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.

Response: Cenveo has no information that is responsive to this Request, although Cenveo is not aware that the Swan Island Property would have had any type of waste disposal. However, please see Response 21 herein.

27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:

- a. the persons with whom the Respondent made such arrangements;
- b. every date on which Respondent made such arrangements;
- c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;
- d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;
- e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;
- f. the owner of the materials involved in each such arrangement, if not Respondent;

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- g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;
- h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;
- i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;
- j. who selected the location to which the materials were to be disposed or treated;
- k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and
- l. any records of such arrangement(s) and each shipment.

Response: Cenveo has no information that is responsive to this Request, although Cenveo is not aware that any hazardous waste or waste containing any hazardous substances was ever generated at this warehouse location.

28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).

Response: Please see Cenveo's Response to Request 5 herein.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.

Response: Cenveo has no information that is responsive to this Request.

30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:

- a. the date such operations commenced and concluded; and
- b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response: Please see Cenveo's Response to Request 5 herein.

31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Response: Not applicable.

32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Response: Not applicable. Please see Cenveo's Response to Request 5 herein.

33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

Response: Not applicable.

34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- a. the types of materials used to clean/maintain this equipment/machinery;
- b. the monthly or annual quantity of each such material used;
- c. the types of materials spilled in Respondent's operations;
- d. the materials used to clean up those spills;
- e. the methods used to clean up those spills; and
- f. where the materials used to clean up those spills were disposed of.

Response: Not applicable.

35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.

Response: Not applicable

36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- a. its physical state;
- b. its nature and chemical composition;
- c. its color;
- d. its odor;
- e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Response: Not applicable.

37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

Response: Not applicable.

38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: Not applicable.

39. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Response: Not applicable.

40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, Including, but not limited to the following:
- state where Respondent sent each type of its waste for disposal, treatment, or recycling;
 - identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);
 - if Respondent transported any of its wastes away from its operations, please so indicate;
 - for each type of waste specify which Waste Carrier picked it up;
 - indicate the ultimate disposal/recycling/treatment location for each type of waste;
 - provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and
 - state the basis for and provide any documents supporting the answer to the previous question.

Response: Not applicable.

41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
- the nature and chemical composition of each type of waste;
 - the dates on which those wastes were disposed;
 - the approximate quantity of those wastes disposed by month and year;

- d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
- e. whether and what pretreatment was provided.

Response: Not applicable.

42. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response: Not applicable.

43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.

Response: Not applicable.

44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.

Response: Not applicable.

45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.

Response: Not applicable.

46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.

Response: Not applicable.

47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.

Response: Not applicable.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.

Response: Not applicable.

49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.

Response: Not applicable.

Section 5.0 Regulatory Information

50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.

Response: Cenveo has no information that is responsive to this Request.

51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.

Response: Cenveo has no information that is responsive to this Request.

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.

Response: Not applicable.

53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.

Response: Not applicable.

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

Response: Not applicable.

55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response: Not applicable.

56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.

Response: Not applicable.

58. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.

Response: Not applicable.

59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.

Response: Not applicable.

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.

Response: Not applicable.

61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.

Response: Not applicable.

Section 6.0 Releases and Remediation

62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:
- a. when such releases occurred;
 - b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
 - c. the amount of each hazardous substances, pollutants, or contaminants so released;
 - d. where such releases occurred;
 - e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;
 - g. all persons with information relating to these releases; and
 - h. list all local, state, or federal departments or agencies notified of the release, if applicable.

Response: Not applicable.

63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:
- a. where the disposal system or floor drains were located;
 - b. when the disposal system or floor drains were installed;
 - c. whether the disposal system or floor drains were connected to pipes;

- d. where such pipes were located and emptied;
- e. when such pipes were installed;
- f. how and when such pipes were replaced, or repaired; and
- g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.

Response: Not applicable.

64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:
- a. amount of soil excavated;
 - b. location of excavation presented on a map or aerial photograph;
 - c. manner and place of disposal and/or storage of excavated soil;
 - d. dates of soil excavation;
 - e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;
 - f. reason for soil excavation;
 - g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Property;
 - i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and
 - j. all persons, including contractors, with information about (a) through (i) of this request.

Response: Cenveo has no information that is responsive to this Request.

65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.

Response: Cenveo has no information that is responsive to this Request, but doubts that there ever would have been a reason to test groundwater under the Swan Island Property.

66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:

- a. reason for groundwater action;

- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;
- c. all analyses or tests and results of analyses of the groundwater;
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and
- e. all persons, including contractors, with information about (a) through (c) of this request.

Response: Cenveo has no information that is responsive to this Request, but doubts that any kind of action on groundwater was ever taken.

67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;
- b. the dates of each such occurrence;
- c. the amount and location of such release;
- d. were sheens on the river created by the release;
- e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.

Response: Not applicable.

68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.

Response: Not applicable.

69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.

Response: Not applicable.

Section 7.0 Property Investigations

70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.

Response: Cenveo has no information that is responsive to this Request.

71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.

Response: Cenveo doubts any such investigation would have occurred, but Cenveo has no information that is responsive to this Request.

72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.

Response: Cenveo doubts that any remediation or response action was ever taken at the Swan Island Property, but Cenveo has no information that is responsive to this Request.

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:

- a. what the nature and scope of these investigations will be;
- b. the contractors or other persons that will undertake these investigations;
- c. the purpose of the investigations;
- d. the dates when such investigations will take place and be completed; and
- e. where on the Property such investigations will take place.

Response: No.

Section 8.0 Corporate Information

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:
- state the current legal ownership structure (e.g., corporation, sole proprietorship);
 - state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;
 - discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;
 - the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and
 - if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
- whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.

Response: Please see Cenveo's Response for the main GAC facility located at 2000 NW Wilson Street.

77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
- a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;
 - b. the dates such relationship existed;
 - c. the percentage of ownership of Respondent that is held by such other entity(ies);
 - d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
 - e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and
 - f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

Response: Please refer to Cenveo's Responses 75 and 77 in its response for GAC's current facility at 2000 NW Wilson Street in Portland.

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.

Response: Not applicable.